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**Assunto:** Certification of foreign maintenance organization. Origem: SAR/GTPN

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## 1. SUBJECT

This supplementary instruction - IS clarify, provides guidance and details the foreign maintenance organization - MO certification procedures of ANAC under the brazilian RBAC 145.

*Note 1 – ANAC only provides a brazilian certificate for foreign MO previously certified by its own local civil aviation authority (foreign primary authority), with certificate still valid.*

*Note 2 – this english version is a courtesy provided by ANAC.*

## 2. REVOCATION

This IS replaces IS 145-002A.

## 3. LEGAL BASIS

3.1 In accordance with art. 70 of law nº 7.565, of 19 de dezembro de 1986 (“Código Brasileiro de Aeronáutica” – CBAer), all MO that approves an article to return to service to be installed in a brazilian registered aircraft must own a maintenance organization certificate.

3.2 In accordance with art. 8º, XVII, of law nº 11.182, de 27 de setembro de 2005, ANAC is responsible to proceed and issue certifications, to approve and provide authorizations regarding activities related to brazilian civil aviation safety jurisdiction.

3.3 Resolution nº 30, de 21 de maio de 2008, Art. 14, establishes that ANAC may issue a supplementary instruction to clarify, provides guidance and details any RBHA/RBAC requirements.

## 4. DEFINITIONS

This IS uses definitions and concepts further established in the following brazilian regulations: RBAC 01, RBAC 43 e RBAC 145.

## 5. SUBJECT DEVELOPMENT

### 5.1 Foreign maintenance organization certification

5.1.1 The foreign MO certification process, even considering the similarities with domestic MO certification process, takes some special characteristics into considerations:

- a) Geographic distance – result in a restricted number of audits performed by ANAC; and

- b) The existence of a foreign primary certification authority, that has the authority of continuous surveillance over the foreign MO, is more effective than any other ANAC means.

5.1.2 Considering the above characteristics, a special set of rules could be considered, provided maximum informations and surveillance means already available from the primary civil aviation authorities.

5.1.3 This IS presents the procedures related to a foreign MO certification by ANAC, covering the following:

- a) Initial Certification (in accordance with RBAC 145.51);
- b) Certification renewal (in accordance with RBAC 145.55); and
- c) Certification amendment (in accordance with RBAC 145.57).

## **5.2 FAA or EASA primary authority foreign MO certification**

5.2.1 ANAC considers FAA and EASA aeronautical & product maintenance regulations equivalent to Brazilian regulation established by RBAC 145.

5.2.2 Following section 145.53(b)-I of RBAC 145, ANAC can consider as its own the requirement compliance for each foreign MO certified in US and EU, if that foreign authority (FAA or EASA) is responsible for its certification.

5.2.3 By this, the MO requirements accomplishment method will be considered with the above characteristics and, in accordance with those aspects, some certification process, renewal and amendment would be different for those OM.

5.2.4 Primary authority, for ANAC, is the one that is directly responsible for the domestic OM certification and surveillance. Example: EASA is the primary authority for the OM located in Europe and FAA is the primary authority for the OM located in US.

## **5.3 The certification process**

5.3.1 **Certification phases:** a foreign MO certification process has the following phases:

- a) Submission of the certification application and documents;
- b) Certification application and documents analysis;
- c) Audit scheduling;
- d) Audit scheduling confirmation;
- e) Audit;
- f) Audit finding report;
- g) Nonconformity corrective plan; and
- h) Certificate documents issuance.

*Note – Considering the 5.2 section of this IS, regarding audit by FAA (or EASA), the FAA (or EASA) certified MO are exempted of phases a) to g).*

### 5.3.2 Submission of the certification application and documents:

- a) The certification application , ANAC form F-900-73, is available at:  
<http://www2.anac.gov.br/certificacao/Form/Form.asp>
- b) The certification application must be submitted by the MO accountable manager, and mailed to the following ANAC address:

I- Foreign MO located in EUA:

Agência Nacional de Aviação Civil – ANAC  
Superintendência de Aeronavegabilidade - Divisão de Aeronavegabilidade / SP  
Avenida Cassiano Ricardo, 521 – Bloco B/2o andar  
Parque Residencial Aquarius  
São José dos Campos / SP  
CEP: 12.246-870  
Brazil

II- Foreign MO located outside EUA:

Agência Nacional de Aviação Civil - ANAC  
Superintendência de Aeronavegabilidade - SAR  
Avenida Presidente Vargas, 850 - 16° Andar  
Centro - Rio de Janeiro - RJ  
CEP 20071-001  
Brasil

*Note - additional copies may be forwarded to: [foreign145@anac.gov.br](mailto:foreign145@anac.gov.br)*

- c) The foreign MO must provide the following documents, that must be addressed to ANAC altogether with the application, in order to enable the analysis by the ANAC technical team of Superintendência de Aeronavegabilidade – SAR:

- I- Maintenance Organization Certificate – COM proposal (ANAC Form F-900-71 see website: <http://www2.anac.gov.br/certificacao/Form/Form.asp>), including the class -ratings the MO intend to perform maintenance, preventive maintenance, rebuild and alteration. See section 145.59 do RBAC 145;

*Note 1 - the COM proposed to ANAC cannot include class-ratings other than those already certified by its own local civil authority, except the special services from section 145.59 of the RBAC 45 class rating. In this particular case, the special service must be equivalent to the MO certified limited rating obtained with its own local civil authority.*

*Note 2 – the MO accessory class rating certification includes APU engine. If the same APU is provided as a propulsion system of an aircraft and the MO intend to be certified in this engine, then the MO must be certified in the engine class rating- see section 145.59 of RBAC 145.*

- II- Operating Specification – EO proposal (ANAC form F-900-72, see website:

<http://www2.anac.gov.br/certificacao/Form/Form.asp>) listing the aircraft models, engines, propellers, rotors, equipments and/or special services (145.61 of 14CFR145 limited ratings) the MO intend to perform maintenance, preventive maintenance, rebuilding and alteration;

*Note - an EO submitted to ANAC cannot contain aircraft, engine, propeller, equipments and/or special services (145.61 of 14CFR145 limited ratings) other than those already certified by its own local civil aviation authority.*

III- Capability List – LC proposal, containing the equipments (product, parts, components, instruments and accessories) identified by manufacturer model and/or part number listing the products the MO intend to be certified by ANAC. The LC accepted by its local civil aviation authority is acceptable for ANAC.

IV- List of technical personnel (roster), including each license number;

*Note 1 - in accordance with section 145.151(e)-I of RBAC 145, a foreign MO must have personnel qualified and to demonstrate to be able to read and understand the portuguese, whenever is necessary to accomplish with the brazilian regulations. This requirement is also important in regarding maintenance records in portuguese.*

*Note 2 - section 145.151(a)-III of RBAC 145 is a brazilian requirement regarding other brazilian laws. To establish a regulations equivalency, a foreign OM is required to provide the name of a MO person that is directly responsible for any technical subjects. ANAC considers that the accountable manager may not be the appropriate person to exercise those activities. QA manager or Chief Inspector are acceptable for ANAC.*

V- A signed statement by the accountable manager listing all tool, equipments, test equipments, bench tests and technical documents required to safety performance of the work and responsibilities.

*Note - section 5.4.2 of IS 145-009 is a recommended proposal to demonstrate the effective form regarding tools and documents show compliance.*

VI- Foreign MO Certificate and EO or equivalents, issued by primary local civil aviation authority;

VII- Letter issued by a brazilian operator or brazilian OM stating the intent of using the applicant OM services, in accordance with section 145.51(c) of RBAC 145;

VIII- Compliance Check List regarding the requirements of RBAC 43 and 145 and IS's (as applicable), with the cross-reference to the manuals and the brazilian supplement.

*Note – the compliance checklist is a valuable tool to ANAC assess the MO eligibility to receive a brazilian COM, as it provides means for the MO to show how it will comply with the applicable brazilian requirements to its operation through the use of its manuals, accepted or approved, and brazilian supplement. IS 145-001 provides guidance on its elaboration. Also Form F-900-70, available at website: <http://www2.anac.gov.br/certificacao/Form/Form.asp>, may serve as a guidance for it.*

- IX- Copy of the accepted foreign Manuals: maintenance organization manual, quality manual and training program approved by its local civil aviation authority;

*Note - the MO manual (or manuals: MOM & MCQ - quality manual and training program) that are accepted/approved by ANAC. by its local authority are accepted by ANAC.*

- X- A Brazilian supplement to the existing manual (or manuals) covering all regulatory requirements applicable to maintain a Brazilian aeronautical product not covered by the original manual (or manuals). The Appendix B of this IS could be used as a guidance in developing the Brazilian supplement to the manual (or manuals) of MO;

*Note - if the manual (or manuals) is not published in English or Portuguese, the submitted manual (or manuals) to ANAC must be provided in English or Portuguese. The Brazilian supplement must be provided in English or Portuguese also.*

- XI- The set of manuals to be supplied to ANAC for analysis must show elements that reflect the compliance to each requirement listed on the Compliance Checklist. In order to do so they should not include only general policies and directives but sufficiently detailed procedures to show requirements compliance. IS 145-009 (Portuguese only) provides guidance for compliance on requirements related to manual.

- XII- List of subcontracted maintenance function approved by the foreign MO local civil aviation authority.

*Note - the same subcontracted maintenance functions may be accepted by ANAC.*

- XIII- TFAC proof of payment.

*Note - The procedures and information regarding TFAC fee value is found in the APPENDIX D of this IS and at website:*

*<http://www2.anac.gov.br/empresas/certificado.asp>*

### 5.3.3 Certification application and documents analysis

- a) Upon receipt of the application, the technical personnel of the ANAC's Superintendence of Airworthiness – SAR will analyze the application documents. If not all the required documents are included in the package or non-conformities have been found, the ANAC will issue a document (ofício) stating the pending items. Missing documents may lead ANAC to conclude that the application was not initiated.

*Note - each pending item requires corrective action by the applicant.*

- b) The deadline to present all corrective actions will be within 90 (ninety) days after the document issuance (ofício) by ANAC.

*Note - The failure to meet the imposed deadline will result in the cancellation of the application process.*

- c) This phase will be closed when the ANAC issues a document (ofício) stating that all application documents have been considered acceptable or approved (as the case).

- 5.3.4 **Audit scheduling:** this phase is under the responsibility of the MO. The MO must propose a convenient schedule to ANAC audit in a written document, by mail. The document must include the proposed dates for a working week.

*Note – Considering the OM included in section 5.2 of this IS, the certification audit promoted by its local authorities will be used for requirement accomplishment and, by this way, sections 5.3.4, 5.3.5, 5.3.6, 5.3.7 and 5.3.8 of this IS will be considered not applicable.*

#### 5.3.5 **Audit scheduling confirmation**

- a) A document (ofício) will be sent to the MO, informing the audit team, the date of the audit, including the audit sequence. A document (ofício) will also be sent to the national civil aviation authority of the country where the MO is located, with the audit schedule.
- b) The audit team will follow the procedures established on ANAC's Procedure Manual MPR-900, volume 2, regarding the audit procedures.

#### 5.3.6 **Audit**

- a) With the audit schedule, the MO must be prepared to receive the audit.
- b) Any changes to the proposed schedule must be addressed in the initial meeting between the audit team and the OMs staff.
- c) At the end of audit, the audit team will have an internal meeting. The MO must provide an appropriate room for the meeting.
- d) Soon after, a final meeting with the MO accountable manager will end the audit process, with the release of nonconformity preliminary report - RNC. At this meeting, the audit team leader will hand out all nonconformity items found (if detected) and necessary observations. Any discussions raised during the meeting must be registered by the audit team and brought to the ANAC's office.

*Note – the final report containing all nonconformity will be issued later, via ofício by ANAC, and this information is remarked at the preliminary report.*

- e) The ANAC's Superintendence of Airworthiness – SAR will issue the official communication (ofício) within 10 working days, after the internal process of the audit team.

#### 5.3.7 **Audit finding report**

After the arrival of the audit team, all internal pertinent documents will be filled out. The audit report will be analyzed and a document (ofício) will be issued by the ANAC's Superintendence of Airworthiness – SAR. Any nonconformity item found will need a formal answer from the MO before the issuance of the Certification document. If no nonconformity items are raised, the certification documents will be issued.

- 5.3.8 **Nonconformity corrective plan:** if there is any nonconformity item raised in the audit finding report, the MO must address the nonconformity items by a nonconformity corrective action plan. This plan must state the nonconformity raised, the corrective action accomplished or proposed of correction date and the current situation of the nonconformity.

### 5.3.9 Certificate documents issuance

- a) After all nonconformity items are corrected or addressed by an acceptable method, the ANAC's Superintendence of Airworthiness – SAR will issue the following documents:
- I- Maintenance Organization Certificate (COM), stating the class ratings according to Form F-900-71 (see website: <http://www2.anac.gov.br/certificacao/Form/Form.asp>)
  - II- Operations Specifications (EO), stating the aircraft, engine and/or propeller types and models and the limitations to the certification, according to Form F-900-72 (see website: <http://www2.anac.gov.br/certificacao/Form/Form.asp>)
  - III- Acceptance of Capability List;
  - IV- Acceptance of the Brazilian Supplement;
- b) The Certification expiration date will be stated in the COM that shall continue in effect up to the end of 24 (twenty four) months after the date on which it was issued, unless it is sooner suspended, revoked or canceled. The COM will state also the address or the addresses of the facilities audited during the certification process.

*Note - considering section 5.2 for any OM, since the audit is not applicable, the installations addresses considered in the petition to ANAC will be those already certified by its local authority.*

### 5.4 Certification renewal process

The MO certification renewal process of a foreign MO has the following phases:

- a) Submission of the certification renewal application and documents;
- b) Certification application renewal and documents analysis;
- c) Audit scheduling;
- d) Audit scheduling confirmation;
- e) Audit;
- f) Audit finding report;
- g) Nonconformity correction plan; and
- h) Certificate documents issuance.

*Note – Considering the OM included in section 5.2 of this IS, the certification audit promoted by its local authorities will be used for requirement accomplishment and, by this way, the phases c) to g) are considered not applicable.*

#### 5.4.1 **Submission of the certification renewal application and documents**

- a) A foreign MO certified by the ANAC which intends to have its certification renewed must submit, at least 60 (sixty) days prior to the certification expiration, the renewal certificate application and documents to the address informed in paragraph 5.3.2 of this IS. Those 60 days are necessary to ANAC internal procedures to process the application, preventing the COM expiration.

*Note – if the OM only applies 30rd days after the expiration date, ANAC considers that the OM lost its Brazilian certificate. The OM will be required to apply for a new certification process in accordance with section 5.3.2 of this IS, to maintain Brazilian products.*

- b) The renewal certificate application must include the following documents:
- I- If any alteration was implemented after the Brazilian certification (or last recertification), the COM, EO, e LC accepted by the local civil aviation authority, or equivalent documents emitted by that authority;
  - II- Letter stating any proposed changes to the Brazilian COM, EO e LC (all pertinent documents listed in section 5.3.2 of this IS must be updated); e
  - III- List of services accomplished on Brazilian products since the last issue of COM or the past 24 months, whichever is greater, as required in section 145.55(b)-I of RBAC 145.

#### 5.4.2 **Renewal application and documents analysis**

- a) After the renewal certificate application is received, a technical analysis will be done at the application and documents. All pertinent details of the technical analysis will be stated in a document (ofício), issued by the ANAC's Superintendence of Airworthiness – SAR.
- b) The purpose of the document (ofício) is to inform the OM about any pending item in the renewal certification process.
- c) This phase will be closed when the ANAC issues a document (ofício) stating that all renewal certificate application and documents have been considered acceptable.

5.4.3 **Audit scheduling** - Same as 5.3.4

5.4.4 **Audit scheduling confirmation** - Same as 5.3.5

*Note – in accordance with section 5.4.2(a) of this IS, if OM applies its renewal within 60(sixty) days before the expiration date, if the documents applied are considered satisfactorie and ANAC is not able to audit the OM before the expiration date, it may issue, a validation extension to OM under an exceptional basis.*

5.4.5 **Audit** - Same as 5.3.6

5.4.6 **Audit finding report** - Same as 5.3.7

5.4.7 **Nonconformity correction plan** - Same as 5.3.8

#### 5.4.8 Recertificate issuance

- a) After all nonconformity items are corrected or addressed by an acceptable method, the ANAC's Superintendence of Airworthiness – SAR will issue the following documents:
  - I- Maintenance Organization Certificate (COM), stating the class ratings according to Form F-900-71 , see:  
<http://www2.anac.gov.br/certificacao/Form/Form.asp>
  - II- Operations Specifications, stating the aircraft, engine and/or propeller types and models and the limitations of the Certification, according to Form F-900-72, see: <http://www2.anac.gov.br/certificacao/Form/Form.asp>
  - III- Acceptance of Capability List.
  - IV- Acceptance of Brazilian Supplement to OM manual (or manuals, if applicable).
- b) The Certification expiration date will be stated in the COM that shall continue in effect up to the end of 24 (twenty four) months after the date on which it was issued, unless it is sooner suspended, revoked or canceled. The COM will state also the address or the addresses of the facilities audited during the certification process.

### 5.5 Certificate amendment or change process

5.5.1 **Certificate amend:** an amendment to a certificate must be applied to ANAC. The following amend must be applied 30 (thirty) days before its intended effective day:

- a) **OM ownership transfer:** For a certificate amendment, the applicant has to submit the foreign OM property alteration to ANAC, filling and mailing the certificate proposal (see paragraph 5.3.2(c)(I) of this IS), that cannot present any class-rating already certified. The mailing address is the same already presented at section 5.3.2(b) of this IS.

*Note – a copy of the certificate amended by its local civil authority has to be mailed together with the certificate proposal to be amended by ANAC. The new proprietary/owner has to be the same listed at the certificate emitted by its local civil authority.*

5.5.2 **Certificate change:** in accordance with section 145.57 of RBAC 145, the following changes must be applied 30 (thirty) days before its intended effective day:

*Note - in accordance with section 145.57 of RBAC 145, a MO capability decrease must be informed to ANAC in 5 (five) days and ANAC may establish additional limitations or even a suspension if it's found that the OM has no condition to sustain its certification.*

- a) **MO address change:** For an foreign MO addresses alteration, the applicant has to submit the address alteration to ANAC filling and mailing the certificate proposal with the new address in accordance with paragraph 5.3.2(c)-I of this IS. The alteration cannot include class-rating already certified. The ANAC address to mail the documents is the same of 5.3.2(b) of this IS.

*Note 1 – a copy of the certificate with the new address already altered with the local civil aviation authority has to be mailed with the certificate proposal to ANAC. The*

*new address proposed to ANAC has to be the same contained in the certificate altered with its local civil aviation authority. If the address alteration result in MO manuals revision, those revisions has to be sent with the application.*

*Note 2 – the address alteration has to be preceded of a new installation audit by ANAC, in accordance with section 5.3.4 of this IS. Foreign OM already certified by FAA or EASA are exempted of this audit process for check the adequacy of the new address instalations.*

- b) **MO add or amend a rating:** the following alterations in class-rating are considered for:
- I- **EO alteration** (inclusion of class-rating, or special service): in accordance with paragraph 145.57 of RBAC 145, the application for inclusion a new model (P/N) of aircraft, engine, propeller or special service has to be made by an application to alter the foreign MO EO. Each EO alteration application has to be made 30 (thirty) days before its intended effective date for operation with the new EO, and must include a description of additional requirements necessary: the installations, special tools, technical data access, the personnel qualification, the acceptable personnel to fulfill the RT equivalent requirement, and the manual revision, as required. The process follows the same fases of section 5.3.2 of this IS.
  - II- **CL alteration:** each CL alteration request must be ANAC addressed, unless otherwise determined by the ANAC (ANAC may grant an autoinclusion system to foreign MO CL). A request for increase or decrease in the capability list (inclusion/exclusion) must be made 30 (thirty) days before its intended CL effective date. To request a LC alteration, the foreign MO must self evaluate itself before submitt to ANAC, unless to the foreign MO the autoiclusion was previously granted. Considering an article inclusion, the foreign OM must present all necessary informations for the inclusion process; example: installation alterations, special tools list, personnel qualification requirements, manual updates, self evaluation, as applicable, The inclusion process follows the same applicable phases of section 5.3.2 of this IS. After the proposal analysis, the new CL can be accepted by ANAC in accordance with section 5.3.9(a) of this IS, unless the CL was previously accepted by autoinclusion.

## 6. APPENDIX

Appendix A – Abbreviation list.

Appendix B –RBAC 145 to 14CFR145 differences summary.

Appendix C – The brazilian supplement to the manuals.

Appendix D – ANAC Audit fees payment procedure

## 7. FINAL CONSIDERATIONS

- 7.1 Any process with pending items, left without communication from the Maintenance Organization for more than 90 (ninety) days will be cancelled.

- 7.2 Revision B of IS 145-002, does not require that foreign OM already ANAC certified revise its documents (example: manuals, forms, etc.).
- 7.3 The neglected cases will be solved by the ANAC.
- 7.4 This “Instrução Suplementar - IS” is enforced at its issuance date.
- 7.5 **Contravention of Provisions of Brazilian Aeronautical Code – CBAer:** For any contravention of provisions of CBAer and complementary regulations, the ANAC will issue an Infringement Notice (AI). If the organization defense, to be sent to ANAC, is not considered satisfactory, and depending of the seriousness of the situation, the procedures to be adopted by ANAC will be the suspension, revoking or cancellation of the Certificate, as established in the art. 71 of the Brazilian Aeronautical Code.
- 7.6 In case of divergence, the Portuguese version of this IS shall prevail.

**APPENDIX A - ABBREVIATION LIST****A.1 ABBREVIATION**

AD – Airworthiness Directive

ANAC – National Civil Aviation Agency

AI – Infringement Notice

APRS – Approval to Return to Service

BPS –Service and Personnel Bulletin

CBAer – Brazilian Aeronautical Code

COM – Maintenance Organization Certificate

CST – Supplemental Type Certificate (STC)

DIAM – Annual Maintenance Inspection Declaration

EA – Airplane Especification (TCDS)

FAA – Federal Aviation Administration

IAM – Annual Maintenance Inspection

INMETRO –National Institute of Metrology, Quality and Technology

IPM – Inspection Procedures Manual

IS – Supplementary Instruction

MPR/MPH – Inspector Procedures Handbook

MO – Maintenance Organization/Repair Station

RBAC – Brazilian Civil Aviation Regulation

RBHA – Brazilian Aeronautical Certification Regulation

SAR – ANAC's Superintendence of Airworthiness.

STC – Supplemental Type Certificate

TFAC – Civil Aviation Inspection Tax

**APPENDIX B - RBAC 145 TO 14CFR145 DIFFERENCES SUMMARY**

Brazil has adopted the regulation methodology of United States of America for civil aviation. To facilitate a Brazilian certification process of a foreign MO, a summary of the differences between ANAC regulation RBAC 145 and its correspondent FAA 14CFR145 follows as a guidance. This summary does not contain the RBAC 145 in full plain text.

**145.1 - Aplicabilidade**

**145.3 - Definition of terms:** As definições a seguir são interpretadas de maneira diferente na regulamentação brasileira. Estas diferenças devem ser consideradas na análise de cumprimento dos requisitos para a elaboração do suplemento brasileiro aos manuais da OM.

*Gestor Responsável:* O Gestor Responsável no Brasil também é responsável pelo SGSO (SMS).

*Diretamente responsável:* a definição de diretamente responsável no Brasil também se aplica sobre pessoas não certificadas.

*Manutenção de linha:* a definição e manutenção de linha no Brasil está baseada na definição da EASA.

*Responsável Técnico:* a legislação brasileira requer que a OM relacione uma pessoa como RT. No caso de OM estrangeiras, é aceitável que essa pessoa seja o inspetor Chefe ou o Gerente de Garantia da Qualidade.

**145.5 - Requisitos para o certificado e especificações operativas**

**145.51 - Requerimento para certificação:** no Brasil, o requerimento para certificação requer documentos adicionais, em relação ao requerimento feito nos Estados Unidos da América. Os documentos a serem juntados ao requerimento estão listados na seção 5.3.2(c) desta IS.

**145.53 - Emissão do certificado:** se a OM estrangeira executa manutenção, manutenção preventiva ou alterações para operadores brasileiros certificados pelos RBAC 121 ou 135, deve apresentar declaração para a ANAC que todo seu pessoal de manutenção foi treinado na edição mais recente da *Technical Instructions for the Safe Transport of Dangerous Goods* da ICAO

**145.55 - Validade e renovação do certificado:** 24 meses para OM estrangeira.

**145.57 - Emenda ou transferência de certificado**

**145.1 - Applicability**

**145.3 - Definition of terms.** The following definitions has different interpretation on Brazilian regulations. These differences must be considered in the requirements compliance analysis for the preparation of the Brazilian supplement in MO manuals.

*Accountable Manager:* The accountable manager in Brazil is also responsible for the SGSO (SMS).

*Directly in charge:* the definition of directly in charge in Brazil also applicable in dealing with uncertified person.

*Line Maintenance:* Line maintenance definition in Brazil is based on EASA definition.

*Technical Responsible:* Brazilian regulations include a requirement for MO to indicate its technical responsible. Considering a foreign MO, it is acceptable that the chief inspector or Quality Assurance Manager takes place for this responsibility.

**145.5 - Certificate and operations specifications requirements**

**145.51 - Application for Certification:** certification application in Brazil requires additional documents when compared to application in the United States of America. The requirement document to be submitted by foreign repair station for ANAC certification are listed on section 5.3.2(c) of this IS.

**145.53 - Issue of certificate** if the maintenance organization provides maintenance, preventive maintenance and alteration for any Brazilian operator certified to RBAC 121 or 135, it shall present to ANAC a statement that all personnel of the MO was trained in the foremost edition to the *Technical Instructions for the Safe Transport of Dangerous Goods* by ICAO.

**145.55 - Duration and renewal of certificate:** 24 months for foreign MO.

**145.57 - Amendment to or transfer of certificate**

|  |  |
|--|--|
| <b>145.59 - Categorias e Classes:</b> o regulamento brasileiro inclui a categoria serviços especializados, tal como END (veja mais exemplos na seção 145.59(g)-I do RBAC 145.  | <b>145.59 – Ratings:</b> brazilian regulation includes the special services, like NDT (more examples: section 145.59(g)-I of RBAC 145.   |
| <b>145.61-I - Limitações de certificação:</b> todos os certificados emitidos pela ANAC são limitados.  | <b>145.61 - Limited ratings:</b> all certificates are emitted by ANAC with limitations.  |
| <b>145.101 - Geral</b>   | <b>145.101 - General</b>   |
| <b>145.103 - Requisitos para instalações e recursos</b>  | <b>145.103 - Housing and facilities requirements</b>   |
| <b>145.105 - Mudança de localização, instalações ou recursos</b>   | <b>145.105 - Change of location, housing, or facilities</b>  |
| <b>145.107 - Reservado</b>   | <b>145.107 - Satellite repair stations</b>   |
| <b>145.109 - Requisitos de equipamentos, ferramentas, materiais e dados técnicos</b>   | <b>145.109 - Equipment, materials, and data requirements</b>   |
| <b>145.151 - Requisitos de pessoal:</b> a OM estrangeira deve ter pessoal qualificado (pelo menos uma pessoa) que seja capaz de entender o idioma português escrito, na extensão necessária para entender os regulamentos, instruções suplementares e diretrizes de aeronavegabilidade. Este requisito também é importante com a questão dos registros em português. | <b>145.151 - Personnel requirements:</b> the foreign MO must have qualified personnel (at least one person) who is able to read and understand the portuguese language on written documents, whenever necessary to understand Brazilian regulations, Supplementary Instructions, and Airworthiness Directives. This requirement is also important regarding Maintenance Records in Portuguese. |
| <b>145.153 - Requisitos do pessoal de supervisão:</b> o mesmo acima.   | <b>145.153 - Supervisory personnel requirements:</b> see above.  |
| <b>145.155 - Requisitos do pessoal de inspeção:</b> o mesmo acima.   | <b>145.155 - Inspection personnel requirements:</b> see above.   |
| <b>145.157 - Pessoal autorizado para aprovar um artigo para retorno ao serviço:</b> o mesmo acima.   | <b>145.157 - Personnel authorized to approve an article for return to service:</b> see above.  |
| <b>145.159 - Reservado</b>   | <b>145.159 - Recommendation of a person for certification as a repairman</b>   |
| <b>145.160 - Reservado</b>   | <b>145.160 - Employment of former FAA employees</b>  |
| <b>145.161 - Registros do pessoal de administração, supervisão e inspeção</b>  | <b>145.161 - Records of management, supervisory, and inspection personnel</b>  |
| <b>145.163 - Requisitos de treinamento:</b> para END, veja também as IS 43.13-003 e 145.163-001.   | <b>145.163 - Training requirements:</b> for NDT, see IS 43.13-003 and 145.163-001 also.  |
| <b>145.165 - Treinamento em artigos perigosos</b>  | <b>145.165 - Hazardous materials training</b>  |
| <b>145.201 - Prerrogativas e limitações do certificado</b>   | <b>145.201 - Privileges and limitations of certificate</b>   |

|   |  |
|---|--|
| <b>145.203 - Trabalho executado em outra localidade</b>   | <b>145.203 - Work performed at another location</b>  |
| <b>145.205 - Execução de manutenção, manutenção preventiva ou alteração para detentor de certificado segundo os RBAC 121 e 135</b>  | <b>145.205 - Maintenance, preventive maintenance, and alterations performed for certificate holders under parts 121, 125, and 135, and for foreign air carriers or foreign persons operating a U.S.-registered aircraft in common carriage under part 129.</b> |
| <b>145.206 - Reservado</b>  | <b>145.206 - Notification of hazardous materials authorizations</b>  |
| <b>145.207 - Manual da organização de manutenção:</b> veja as IS 145-009 e 145-010.   | <b>145.207 - Repair station manual:</b> see is 145-009 and 145-010 also.   |
| <b>145.209 - Conteúdo do manual da organização de manutenção:</b> veja as IS 145-009 e 145-010.   | <b>145.209 - Repair station manual contents:</b> see IS 145-009 and 145-010 also.  |
| <b>145.211 - Sistema de controle da qualidade:</b> veja as IS 145-009 e 145-010.  | <b>145.211 - Quality control system:</b> see IS 145-009 and 145-010 also.  |
| <b>145.213 -Inspeção da manutenção, manutenção preventiva e alteração</b>   | <b>145.213 Inspection of maintenance, preventive maintenance, or alterations.</b>  |
| <b>145.214-I - Sistema de Gerenciamento da Segurança Operacional – SGSO:</b> a OM deve cumprir com o SGSO   | <b>145.214-I - the maintenance organization shall comply to a SGSO.</b>  |
| <b>145.215 - Lista de Capacidade</b>  | <b>145.215 - Capability list</b>   |
| <b>145.217 - Manutenção subcontratada:</b> a ANAC aceita a função de manutenção subcontratada ou a aprovada pela sua autoridade local de aviação civil                            | <b>145.217 - Subcontract maintenance:</b> ANAC accept subcontracted maintenance function or previously approved by its local civil aviation authority  |
| <b>145.219 - Arquivamento de registro 5 anos</b>  | <b>145.219 – Recordkeeping 5 years</b>   |
| <b>145.221 - Relatórios de dificuldade em serviço</b>   | <b>145.221 - Service difficulty reports</b>  |
| <b>145.221-I - Relatórios periódicos:</b> na data de renovação do certificado, a OM deve informar pelo menos um serviço realizado em produtos aeronáuticos brasileiros, se houve. | <b>145.221-I - Periodic reports:</b> at certificate renewal date, the MO has to inform at least one service processed in brazilian products, if occurred.  |
| <b>145.223 - Inspeções pela ANAC</b>  | <b>145.223 - ANAC inspections</b>  |

## **APPENDIX C - THE BRAZILIAN SUPPLEMENT TO THE MANUALS**

### **C.1 PURPOSE**

C.1.1 The purpose of this appendix is to establish, as necessary, a guideline for the Brazilian Supplement of the Maintenance Organization manuals, in order to comply with the requirements of RBAC 145 and RBAC 43.

*Note – the following pages presents a model of supplement. The model is an example only.*

C.1.2 The guidance herein established should not preclude the Maintenance Organization to document its procedures on a meaningful and usable way. Doubts regarding the way the procedures are written should be dealt with ANAC in a case by case analysis.

C.1.3 By the means of the Brazilian Supplement the MO must:

- a) notify ANAC, in writing, about any Accountable Manger and QA Manager change as mentioned in (RBAC 145.209(a)(4)-I).
- b) notify the ANAC upon any change to the existing facility major characteristics (RBAC 145.209(c)).
- c) require to the ANAC, at least 60 (sixty) days prior to the expiration of its Repair Station Certificate (RBAC 145.55(c)), a re-certification audit, in order to become able to renew such certificate for a period established in the latest revision of the Brazilian regulations or a period determined by ANAC, if the MO decides to continue providing maintenance, preventive maintenance, alteration and/or repair services on Brazilian aeronautical products. The 60 (sixty) days period is necessary to ensure the MO complies with any complementary requirements prior to the Brazilian certification expiration date and to the arrival of ANAC auditors.
- d) have qualified personnel able to read Portuguese and has a basic comprehension of such language (RBAC145.151(e)-I). This person has to be available for immediate consultation whenever a maintenance, preventive maintenance, alteration or repair is performed and he/she has to assist, if needed, the QA Manager in performing tasks as:
  - I- review record entries of Brazilian aeronautical products for, as example, determining the work scope before performing maintenance tasks;
  - II- read and comprehending ANAC regulations for correct interpretation of Brazilian civil aviation requirements;

### **C.2 SUPPLEMENT OF MANUALS**

C.2.1 Certification is a process that relies on compliance verification of the requirements defined by regulations. Foreign MO certification has singular characteristics, already discussed on section X.X of this IS, which brings the need for information from OM's local certification process.

C.2.2 The MO manuals, besides its crucial role as a source of information for adequate work, are also one of the most important evidences which support compliance verification of MO

certificate.

- C.2.3 So, if the foreign MO set of manuals do not show full compliance with all applicable Brazilian requirements, ANAC recommends MO to establish additional or supplemental procedures for MO activities that could achieve requirements compliance in a form of a supplement to the original MO set of manuals.

### **C.3 ORGANIZATION OF THE SUPPLEMENT**

- C.3.1 The supplement should be part of the MO manual system in an extent that the specific procedures necessary to ensure compliance with Brazilian regulations are build on the basis provided by the procedures already in use by MO. Therefore, besides ANAC recommends a minimum structure

- C.3.2 Therefore, besides ANAC recommends the following structure to the supplement and respective contents as general use minimum standard, OM is not enforced to replicate procedures already established on its own manuals if they cover adequately the respective brazilian requirement.

- C.3.3 The next sections of this Appendix specify the expected information for each part above indicated. If necessary, other parts, or other information may be required in which case ANAC will give specific guidance for this situation on a case by case basis.

#### **C.3.4 Introductory subjects**

The first parts of the supplement supposed brings information regarding its presentation to the reader. In order to do it, the following structure is recommended:

- a) Cover Page;
- b) Supplement revision control and amendment procedures;
- c) List of effective pages;
- d) Table of contents;
- e) Abbreviations used;
- f) Introduction;
- g) Maintenance Acceptance Basis And Limitation;
- h) Accountable manager commitment/SMS;
- i) Display of certificate.
- j) Access of ANAC personnel;

##### **C.3.4.1 Cover Page**

- a) The cover page of the Supplement should have, at least:

- I- a title which identifies this is a supplement for ANAC;
- II- Company Name and Facility Address;
- III- the manual identifier number; and
- IV- the date of approval or acceptance.

b) Example of cover page:

“ANY M. O.” ANAC Supplement to Maintenance Organization/Quality Manual (MOM/QM)

**BRAZILIAN SUPPLEMENT  
TO MAINTENANCE ORGANIZATION MANUALS**

ANY MAINTENANCE ORGANIZATION INC.  
ANYWHERE STREET, 154  
CITY X – STATE Y, ANY COUNTRY

ANAC COM NR. XXXXX-XX  
Manual Control No. : \_\_\_\_\_

APPROVED BY:

\_\_\_\_\_  
*Name of Manager*  
Accountable Manager  
Any Maintenance Organization

This Supplement together with the <MO name> Manuals form the basis of acceptance by ANAC for maintenance carried out by this organization on civil aeronautical products under the regulatory control of Brazil.

When maintenance is carried out and certified in accordance with the referenced <MO name> Manual and this Supplement, it is accepted as meeting the requirements of the applicable regulations of ANAC.

Revision: Rev. \_\_ Date: \_\_\_/\_\_\_/\_\_\_

#### C.3.4.2 Supplement revision control and amendment procedures

- a) This part of the Brazilian Supplement should present procedures regarding how amendments and revisions to it are processed and controlled by the foreign MO. Items c, d, e and f are suggested means to provide such control.
- b) ANAC considers to be a minimum information on this part:
  - I - Person, within the MO, responsible for amendments to the Supplement.
  - II - Procedures concerning how the manual changes are processed
  - III - Process of manual distribution and availability to maintenance organization personnel and ANAC.
  - IV - Procedures to ensure revision tracking of changes. It should use, for example, an effective pages control and the use of revision bars.
- c) If the MO already has established procedures regarding revision and amendment control which fully address above items, ANAC recommends the MO to use the same procedures to control, avoiding unnecessary repetition of such procedures into the supplement. The MO should simply refer to the general procedures and just detail differences specific to the supplement if necessary.
- d) Although, ANAC recommends special attention to procedures regarding notification of changes on the supplement or other manuals that may affect RBAC's requirements. According to RBAC 145.209(j), these amendments must be submitted to ANAC for acceptance.
- e) According to IS 145-003, small changes in this Supplement, which do not affect considerably the form of compliance with regulatory requirement, do not require prior acceptance of ANAC, the OM can only forward the revision to ANAC.
- f) The following pages contain an example which illustrates a revision control and amendment procedures chapter. Also is provided a sample list of effective pages and table of contents.
- g) Example of a section regarding procedures fo revision control and amendment process:

**REVISION CONTROL AND AMENDMENT PROCEDURES**

- a) Each supplement will have a control number and assignment entry on its cover page;
- b) The master list containing the (MOM/QM) number will be available in the (Intranet Network) and it will include this supplement revision status as well. In addition, it is under the control of (Quality manager);
- c) (Quality Manager) shall review amendments or procedures to this supplement;
- d) A change bar on the left-hand margin indicates changes to sections of this Brazilian Supplement. A revision number will be updated on the list of effective pages. The revised pages are sent to all copyholders;
- e) Extensive changes to this supplement shall warrant a complete re-issue;
- f) This supplement is continuously updated as the need arises;
- g) (Quality Manager) or his/her designate is responsible to establish the distribution to the copyholders;
- h) Copyholders of this Supplement are as shown in the distribution list in (Section X);
- i) The supplement is made available to all internal staff by posting in the (LAN (local area network) at (IP address);
- j) When each subsequent revision is incorporated, all internal departments will be notified through a notice of ((revision/acknowledgement form) (see Section X page Y and Z)) as well as any instructions to the copyholders for embodiment of such revisions or new issues;
- k) The copyholder's manual is numbered for identification control and the master supplement is stamped "Master Copy";
- l) All uncontrolled copies of the supplement will be stamped "Uncontrolled" and holders of such supplements will not be updated on changes;
- m) The copyholder is responsible to ensure the supplement is current and to make it available to users requiring it;
- n) He/She ensures the superseded pages /procedures/manuals are discarded; and
- o) He/She acknowledges receipt of new issues/revision of the manual on the (Acknowledgement form);
- p) (Company name) shall submit not only any revisions to the Brazilian Supplement but also any changes to the (Repair Station Manual abbreviation) that might affect the Brazilian requirements, for their acceptance before performing any work on Brazilian products. Furthermore, no revision to the (Repair Station Manual name) shall be presented to ANAC before its previous acceptance by the (National Civil Aviation Authority abbreviation).

### C.3.4.3 List of effective pages, table of content and abbreviations used parts

These parts are part the system ANAC recommends to provide adequate use of the manual and change tracking capability. The maintenance organization may use different systems of control and cross reference if it achieves the same level of usability

#### C.3.4.4 Introduction

- a) This part of the Supplement should address how the supplement should be used within maintenance organization work. It should contain at least:

- I - Explanation of the importance of the manual. An acceptable statement might be as follows:

#### INTRODUCTION

This supplement expands on and complements the contents of (name of civil aviation authority)'s accepted (name of repair station/inspection procedures/quality assurance manuals), regarding maintenance performed on Brazilian registered (aircraft, engines and/or components or parts thereof). All work performed on such items observe the guidance of this manual, the RBACs (Regulamentos Brasileiros da Aviação Civil) and the limitations of Brazilian Maintenance Organization Certificate (Certificado de Organização de Manutenção – COM).

- II - How the manual is organized to work with the procedures contained on the other organizations manuals.

This Supplement is contained in each (Civil Aviation Authority Abbreviation) Maintenance Organization/Quality Assurance Manual (MOM/QAM) which has a control number and assignment entry on its Record of Revisions page.

Whenever conflicting issues result between (name of your Civil Aviation Authority regulations) and the RBAC, this supplement and the RBACs will take precedence over the (name of civil aviation authority regulation), when maintenance services on Brazilian aeronautical products are involved.

- b) The introduction must also contain:

- I - (Name of Company) must obtain ANAC acceptance for any changes of this supplement that might not comply with RBAC requirements before those modifications being incorporated to company procedures. These changes will be sent to the following address, which must be used for all contacts to be done with ANAC:

<ANAC address in Rio de Janeiro – RJ for American MO>; or

<ANAC address in Sao Jose dos Campos – SP for other countries MO>.

Additionally, copies can be forward to: [foreign145@anac.gov.br](mailto:foreign145@anac.gov.br)

- II - The rights derived from the Brazilian COM are valid while the operations are at the address stated on this Supplement. Modification to the COM will be required by ANAC in case of address change or alterations to the company certi-

fication. No address changes will take place without prior knowledge and written approval from ANAC.

#### C.3.4.5 Maintenance acceptance basis and limitation

- a) ANAC foreign MO acceptance is based upon full compliance with each other maintenance regulations.
- b) This acceptance of maintenance is limited to the scope of work permitted under the current approval granted by ANAC to the MO, in accordance with the applicable regulations, locations and limitation specified in the supplement.
- c) In order to fulfill this disposition it is necessary that this part of the Supplement to specify the current regulation used as base for the acceptance and all limitation, information of the location of the AMO and other information required by ANAC.

#### C.3.4.6 Accountable manager commitment statement/sms

- a) This part of the Supplement represents the agreement by the accountable manager that the MO will comply with the conditions specified in the supplement.
- b) The accountable manager is also responsible for the MO Safety Managing System - SMS (Sistema de Gerenciamento da Segurança Operacional – SGSO) and its implementation plan, as established by section 145.214-I of RBAC 145.

*Note - when the accountable manager is replaced, the new one must, within 30 (thirty) days, sign the statement so as not to invalidate the acceptance.*

- c) An acceptable statement might be as follows and must be dated and signed by the accountable manager:

This Supplement defines, in conjunction with the Manual above referenced the organization and procedures upon which by the ANAC identified in this Supplement acceptance is based.

It is recognized that the organization's procedures do not override the necessity of complying with any additional requirements formally published by the ANAC in this Supplement and notified to this organization from time to time.

It is understood that the ANAC (identified in this Supplement) will list this organization as an acceptable source of maintenance for Brazilian civil aeronautical products under the regulatory control of ANAC in a formal publication of ANAC, while ANAC is satisfied that the procedures are being followed and work standards maintained. It is further understood that the ANAC reserves the right to withdraw acceptance (suspend or cancel any privileges granted pursuant) and remove the organization from the formal publication if it is considered that procedures are not followed or that the standards are not maintained

#### C.3.4.7 Display of certificate

- a) This part of the Supplement should indicate that the MO COM must be displayed in public view at the AMO fixed location and identify the location where the certificate is displayed.
- b) The ANAC Maintenance Organization COM shall be prominently displayed in an area accessible to the general public. This certificate shall be made available for prompt presentation whenever request by the ANAC.

#### C.3.4.8 Access by ANAC personnel

- a) This part of the Supplement should identify the fact that ANAC-SAR staff must be allowed access to the MO for the purpose of assuring compliance with procedures and standards and to investigate specific problems.
- b) There must also be an indication that in the case of a serious non-compliance with regulations or established standards the organization must accept that it may be subject to ANAC-SAR enforcement action in order to maintain status with ANAC-SAR.

#### C.3.5 Maintenance organization general organization and operational procedures

C.3.5.1 These parts of the supplement should bring the basic OM structure and the procedures needed to supplement the original set of manuals that achieve compliance with Brazilian regulations. The following structure is recommended:

- a) Work Orders/Contracts;
- b) Technical documentation/data;
- c) Airworthiness Directives/Airworthiness Limitations;
- d) Tools, Equipments and Materials
- e) Brazilian aeronautical parts identification;
- f) Subcontracting;
- g) Off-site Maintenance;
- h) Major repair/alterations
- i) Maintenance Release Of Aircraft Article;
- j) Maintenance Release Of Aircraft;
- k) Personnel responsible to release to service;
- l) Record Keeping;
- m) Annual Maintenance Inspection (IAM);
- n) Reporting Of Service Difficulties;
- o) Work Report;

### C.3.5.2 Work orders/contracts

- a) This part of the Supplement should address how the work orders/contracts are made with regard to Brazilian products.
- b) The MO must describe how it is ensured that:
  - I - the maintenance contract is understood and agreed to by the parties involved (MO, customer or others);
  - II - the work orders/contracts are detailed and clear by the customer, and the MO must ensure it receives work orders that it understands;
  - III - the work order specifies the inspections, repairs, alterations, overhauls to be carried out, the Airworthiness Directives to be complied with and parts to be replaced;
  - IV - replacement parts shall be certified in accordance with ANAC regulations; and
  - V - the MO obtains any applicable ADs for the aeronautical products it will maintain.

*Note – DA/AD control: the owner/proprietary of the product is responsible for ensure the airworthiness of its product. Is his responsibility to inform any AD/DA to be performed in his product to MO, unless there is any arrangement for the MO perform this control in his name.*

### C.3.5.3 Technical documentation/data

- a) **(Company name)** shall maintain in a current status the documentation used during each work, the applicable technical library for all articles for which it is certified (reference: IS 145.109-001). This technical library shall contain the RBAC, IS, EA (Brazilian TCDS), CBAer, DA and state of design airworthiness directives. The MO can only approve to return to service any Brazilian article whose technical documents provided to maintenance are current.
- b) Brazilian article under maintenance can only receive the return to service provided by the OM if the technical publications related to this article is current and accessible by the OM. The technical library shall be updated to ensure a current status and will be available to technical personnel. If comprehension by personnel becomes difficult, the qualified personnel who is able to read and understand the Portuguese language, required by 145.151(e)-I of RBAC 145 shall act as interpreter of such library.
- c) While a Brazilian aeronautical product is in **(company name)** for maintenance, the above referenced websites/publications will be reviewed before any type of maintenance, in order to guarantee the RBAC, IS, EM (in this case it is an engine – Brazilian Engine TCDS), CBAer, applicable to such product are being complied. The airworthiness directives websites (<http://www2.anac.gov.br/certificacao/DA/DAE.asp>) and state of design civil aviation authority website) will be reviewed immediately before the product return to service.

### C.3.5.4 Airworthiness directives/airworthiness limitations

- a) General concepts:

- I - (Company name) personnel authorized to return Brazilian aeronautical products to service must be certificated under (Local Civil Aviation Regulation Section X). The (QA Manager) is responsible to maintain a roster of these personnel, which shall be presented to ANAC upon request.
- II - Each work order is checked by authorized personnel for work accomplished and parts installed along with required certifications. These authorized personnel shall ensure that all required technician's and inspector's (stamps/signatures) are completed for the work performed.
- III - Prior to return to service, the person who authorized the release to service will perform an audit of the work order package for the (aircraft, engine or component) to determine that all work was performed in accordance with this inspection system and RBAC 145.213.
- IV - ANAC normally releases an airworthiness directive in English and Portuguese. In the case it is released only in Portuguese (or in any other similar situation), when a translation system is not available the qualified personnel who reads and understand portuguese required by section 145.151 of RBAC 145 shall be consulted upon the opening and prior the closure of any work order of Brazilian aeronautical products, in order to make sure that no particular aspects of the Brazilian regulations are being overlooked.
- V - Whenever the Brazilian operator requires, in compliance with RBAC 39 requirements, and IS 39-001, this inspection will also include the review of any applicable Brazilian airworthiness directives (see <http://www.anac.gov.br/certificacao/DA/DAE.asp>) and applicable ADs issued by the civil aviation authority of the state responsible for type design of the product being maintained.
- VI - When records package is in compliance as indicated by the audit, the person who is authorized to return to service Brazilian aeronautical products shall approve the article for return to service.
- VII - The return to service process shall be in compliance with RBAC 43 as appropriate to the work accomplished and any special requirements of the operator.
- VIII - The engine or equipments (instruments, parts, component) return to service procedure will include the issuance of an ANAC form F-100-01 "Certificado de Liberação Autorizada/Etiqueta de Aprovação de Aeronavegabilidade" (<http://www2.anac.gov.br/certificacao/Form/Form.asp>) for any engine, propeller or equipment (instrument, parts, component) overhauled or repaired by (name of the company) is capable of performing maintenance on it according to its Brazilian Ops Specs ("Especificações Operativas"). An ANAC Form F-100-01 will be filled out and supplied according to IS 43.9-002 (When the component will be removed and re-installed in a Brazilian aeronautical product).
- IX - The maintenance record entry shall include the following:
- X - A copy of the work order including the stamp (or signature) of the technician who performed the work as well the stamp (or signature) of the inspector who was responsible for the inspection of maintenance accomplished, if applicable;

- XI - A signed maintenance release statement with the certified repair station number along with ANAC certificate number. In case of APRS of an engine/aircraft, the maintenance release must include the following statement: “The engine/aircraft described was repaired/inspected in accordance with the current Regulamentos Brasileiros de Aviação Civil (RBAC) and it is approved for return to service”.
- b) This part of the Supplement must address how MO assure:
- I - compliance with Airworthiness Directives and any airworthiness limitations. The applicable ANAC regulations on Airworthiness Directives must be complied with;
- II - that Airworthiness Directives, Airworthiness Limitations, and other requirements declared mandatory by the State of Registry are available to maintenance personnel; and
- III - that the customer provide a copy of all ADs that must be complied with to the MO and identify any airworthiness limitations to the MO.
- c) The customer remains responsible for specifying any AD compliance required during maintenance and any airworthiness limitations through the work order.

#### C.3.5.5 Tools, equipment and materials

- a) Foreign MO shall use the tools, equipment, and test apparatus necessary to assure completion of the work in accordance with accepted industry practices. If special equipment or test apparatus is recommended by the manufacturer involved, he must use that equipment or apparatus or its equivalent according to procedures described in OM’s manuals (reference 145.109(c) of RBAC 145).
- b) (Company Name) is equipped to meet the requirements of Section 145.109 of RBAC 145. All inspection and test equipment will be calibrated at regular intervals, as required on section 145.109(c)-II, specified by equipment manufacturer or other acceptable by ANAC, with standards traceable to his National approved International Calibration Standards acceptable by manufacturer or by his authority ou by ANAC.

#### C.3.5.6 Brazilian aeronautical parts identification

- a) Identification of Brazilian aeronautical articles must be made prior to performing any maintenance, alteration or repair.
- b) Whenever a work order is generated for a Brazilian articles a statement as presented bellow, or similar, shall be placed in it:

This is a part/product for which all maintenance, repair or alteration must be done in strict adherence to the Brazilian supplement, to (Company Manual) manuals and to Brazilian civil aviation legislation.

- c) This statement shall be stamped in the “work to be accomplished” section of the customer’s work order form.

- d) All aeronautical parts removed from a Brazilian (aircraft/engine/propeller) shall have a tag indicating it as useable, repairable or condemned, containing information about (aircraft registration marks), (aircraft and/or engine/propeller) model and S/N in order to ensure their identification.

### C.3.5.7 Subcontracting

- a) This part of the Supplement should address the procedures for subcontracting work. Subcontracted work can be subcontracted from a certified and noncertified person. Only maintenance functions can be subcontracted. Since only maintenance function is subject to subcontracting, it does not involve a complete article.
- b) Subcontracted work is necessarily seen as a part of a maintenance service scope which will be under (**company name**) approval to return to service (RBAC 145.217).
- c) In case of subcontracted work, the foreign MO shall perform the majority of maintenance service scope, and provide means of inspection of the item subcontracted.
- d) All subcontracted work for Brazilian aeronautical products shall be preferably accomplished by FAA/EASA or ANAC certified MO. The following maintenance can be provided by a subcontracted agency that has the necessary equipment and materials:
- I - Windshield polishing;
  - II - Painting;
  - III - Machining;
  - IV - Welding;
  - V - Metal plating or Anodizing.
- e) A non certified person can perform a subcontracted work for (**Company name**), if that person is approved as one of his service supplier, and is periodically subjected to (**Company name**) quality audits.
- f) In some instances, subcontracted work regards to any maintenance services on Brazilian aeronautical products a foreign MO does not want to perform (although rated for but it is temporarily unable to perform due to a lack of appropriate personnel, tools and/or equipment, excessive workload or an emergency situation). Be aware these characteristics can not be used to differ subcontracted work from contracted work (see note below).

*Note – Contract maintenance: when an operator or a maintenance organization contracts a work from another maintenance organization related to an entire article, then the subject is not a maintenance function and subcontract is not applicable. Examples: repair/overhaul of aircraft, engine, propeller, equipment (instruments, parts, component, LRU, ...). This kind of work can involve an authorized release certificate by the contracted maintenance organization, except for aircraft. This is usually performed by, as an example, an aircraft rated maintenance organization contracting maintenance from an engine rated maintenance organization. The engine maintenance organization provides an ANAC form F-100-01 for the engine repaired/overhauled. The aircraft maintenance organization/operator that contracted*

*that maintenance still are responsible for the maintenance release of the entire aircraft.*

#### C.3.5.8 Off-site maintenance

- a) If it is necessary to perform work away from the company premise at (company address), such work shall not exceed the scope of the ANAC rating and it will only be performed inside (country name) continental territory.
- b) It shall be assured by QA Manager that this work performed away from the main base is an exception and it will not be used to permanently perform work at other places.
- c) It is the responsibility of QA Manager to assure the work performed outside its main base is performed by the same rules and standards as the one performed at main base. Therefore, it will be ensured that:
  - I - The current acceptable technical data is available at the location where the work will be performed;
  - II - The necessary tooling, test equipment and facilities are available at the site of the work and that precision tooling and test equipment are duly calibrated;
  - III - The documentation for the performed work is kept in the same way as at the main base;
  - IV - The work records are prepared, as far as possible, before the work is started;
- d) A person authorized to return to service is present to inspect the work and assure that all required work and forms are completed as required before (the engine or article) is returned to service.

#### C.3.5.9 Major repair/alterations

- a) This part of the Supplement should specify how the MO will obtain or establish the process to obtain necessary ANAC approvals when there is no previously approved technical data, prior to the incorporation, of major repairs and major alterations, describing the foreign MO procedure to how he assure that major repairs and major alterations, according applicable ANAC criteria, are incorporated only when foreign MO is granted by ANAC of the appropriate approvals.
- b) Major repair performed by the foreign MO to any aeronautical product related to a Brazilian registered aircraft shall be accomplished in accordance with manufacture's approved data, in accordance with any data approved by the state of design civil aviation authority or ANAC (RBAC 145.201(c)(2)), IS 43.13-004; IS 43.9-001. ANAC manual - MPR 900.04 (Item 4-1186)) set inspector's procedures for this subject
- c) Major alterations performed by the foreign MO to any aeronautical product related to a Brazilian registered aircraft shall be accomplished in accordance with data previously approved in Brazil. This documentation shall be referenced on ANAC form F-

400-04.

- d) For an STC that is not approved by Brazilian authority, before the installation on a Brazilian aeronautical product, the STC holder must apply for a CST (Brazilian STC – former CHST) to be issued by GGCP (see <http://www.anac.gov.br/certificacao/CHST/CHSTE.asp>), following the procedures stated in the IS 21-010 (or FAA AC 21-2) and IS 21-004 in their latest revisions.
- e) Modifications bearing a CST can be embodied to Brazilian registered products, as long as the CST holder grants (company name) a written authorization to such intent and supplies all data needed to accomplish the CST. For a reference list of all CST, see GGCP website (see <http://www.anac.gov.br/certificacao/CHST/CHSTE.asp>).
- f) The Supplement must specify that in the case of foreign MO major repairs and major alterations of Brazilian products must be reported on ANAC Form F-400-04 (similar to FAA form 337) (See IS 43.9-001 with instructions for completing the form F-400-04).
- g) Certain alterations and repairs are eligible for field approval, accordingly to the policy in force at ANAC and GGCP.
- h) Appropriate consultation to current Brazilian policies, ANAC manual - MPR 900.04 (Chapter 9) and other guidance materials, will be made by ANAC personnel prior to assuming a field approval process is applicable to a specific major alteration or repair.

#### C.3.5.10 Maintenance release of aircraft article

- a) This part of the Supplement is for the foreign MO to explain how the release to service of articles up to and including complete engines, and propeller. All applicable regulation of ANAC must identified in this procedure.
- b) This part of the Supplement must indicate the Brazilian Authorized Release Certificate title and number of the applicable Authority that is necessary to be issued.
- c) Procedure in order to apply the following statements in Block 13 (or other number as applicable) of the Brazilian Authorized Release Certificate for foreign MOs:

“Released under the Brazilian Maintenance Organization Certificate N° .....”

- d) When maintenance cannot be performed in accordance with the work order/contract, instruction must inform that this fact must be made known to the customer.
- e) When the foreign MO does not perform aircraft article maintenance, this part of the Supplement should specify “Not Applicable”.
- f) ANAC Form F-100-01 and Suplementar Instruction (Instrução Suplementar) IS 43.9-002 should be used.

#### C.3.5.11 Maintenance release of a complete aircraft

- a) This part of the Supplement is for foreign MO to explain how the maintenance release to service of a complete aircraft should be carried out in accordance with applicable ANAC's regulations.
- b) The procedure must have information that the release should specify the scope of work performed such as the maintenance check as well as any repairs, modifications, Airworthiness Directives and replacement parts together with the identification of the approved data and revision status of the approved data used.
- c) Procedure in order to apply the following statements in work order (or other document name) used for approval for return to service:

“Released under the Brazilian Maintenance Organization Certificate N° .....

- d) When maintenance cannot be performed in accordance with the work order/contract, instruction must inform that details must be entered in the technical logs and the operator informed.
- e) When the foreign MO does not perform aircraft maintenance, this part of the Supplement should specify “Not Applicable”.

#### C.3.5.12 Personnel responsible to release to service

This part of the Supplement must describe the foreign MO procedures and training program will use to ensure that personnel responsible to release to service a product after maintenance, are familiarized with this Supplement and the Brazilian special conditions established in the supplement (see section 145.157 of RBAC 145).

#### C.3.5.13 Record keeping

This part of the Supplement must specify that the foreign MO shall keep a copy of each Work with all attached supplementary forms and Part Certifications. The Work Order shall be maintained in the MO's records files for a period of 5 (five) years (RBAC 145.219(c)).

#### C.3.5.14 Annual maintenance inspection (Inspeção Anual de Manutenção - IAM)

- a) This part of the Supplement is for foreign MO to explain how the organization deal in the event a customer request is submitted for an Annual Maintenance Inspection, in accordance with RBAC/RBHA 91.
- b) The procedure must establish that:
  - I - The foreign MO QA Inspector will review the aircraft logbooks from previous IAM and list any overdue inspections, AD, and life limited articles and inform the operator;
  - II - The operator need to approve or disapprove the maintenance required and If the operator “Does Not Approve” the Inspector will fill out the DIAM Form with the “REPROVADA” box checked off and fax to the ANAC.
  - III - At the end of the IAM oversight, all airworthiness directives issued by the States of Design for the aircraft, engine(s), propeller(s) and appliances, if ap-

plicable, shall be complied with, in addition to any Brazilian issued airworthiness directives.

- c) The procedure must also establish that the foreign MO shall have a translation system, or a technical person on its technical staff, who shall be able to read and have basic comprehension of the Portuguese language.
- d) This translation system or person must be available for immediate consultation whenever maintenance, preventative maintenance, or alterations are performed (especially when certifying an Annual Maintenance Inspection – IAM). This translation system or person also will be charged to review prior entries on the aeronautical products log book.
- e) When the foreign MO does not perform maintenance on aircraft under IAM requirements, or do not want to perform IAM, this part of the Supplement should specify “Not Applicable”.
- f) Annual Maintenance inspection section must also contain:
  - I - In the event a customer requests **(Company name)** to perform an annual inspection (IAM) on an aircraft, reference shall be made to section 91.403(e) of RBHA/RBAC 91.
  - II - The foreign MO QA inspector, together with the qualified personnel who reads and has a basic comprehension of portuguese language, as required by section 145.151(e)-I of RBAC 145, will review the aircraft log books from previous IAM and list any overdue inspections, discrepancies, ADs (Brazilian directives as well the ones issued by the product State of Design), EA (Brazilian TCDS) conformity and life limited or overhaulable components and inform the operator. The operator will then approve or disapprove the maintenance work scope required to be performed.
  - III - If the operator “Does not approve”, or in case the aircraft cannot be returned to service due to an unairworthy condition, the inspector will fill out the form “DIAM (Não-Aeronavegável)” (“Declaração de Inspeção Anual de Manutenção (Não-Aeronavegável)”) (<http://www2.anac.gov.br/certificacao/Form/Form.asp>), check off its “Reprovada” box, and send such form to the ANAC.
  - IV - After approval of such scope, depending on the corrections of discrepancies raised during the inspections, a DIAM (“Declaração de Inspeção Anual de Manutenção”) (<http://www2.anac.gov.br/certificacao/Form/Form.asp>) form is filled and send to ANAC;
  - V - Additionally, these forms for an aircraft IAM must be filled out as required (<http://www2.anac.gov.br/certificacao/Form/Form.asp>): Airplane IAM Report - “Ficha de Inspeção Anual de Manutenção - Asa Fixa” (“FIAM - Asa Fixa”), Rotorcraft IAM Report - “Ficha de Inspeção Anual de Manutenção - Asa Rotativa” (“FIAM - Asa Rotativa”) and IAM Log Book Entry - “Etiqueta para Registro de IAM em caderneta”.

Placards in English may be supplied to Brazilian registered aircraft. However, placards in Portuguese must be supplied, whenever required, to comply with Brazilian TCDS and RBAC 21.

#### C.3.5.15 Reporting of service difficulties

- a) This part of the Supplement is for describe the procedures, in accordance with ANAC's regulations, that the foreign MO will use to ensure that all service difficulties identified during the performance of maintenance shall be reported to the owner, or operator, and ANAC, of the product being maintained.
- b) If a defect or malfunction is detected during the maintenance and inspection process that could result in an imminent hazard to the safety of flight for the aircraft involved, the ANAC shall be notified within 96 (ninety six) hours after the discovery of the defect (RBAC 145.221).
- c) (Local Civil Aviation Authority abbreviation) Mandatory Occurrence/Defect report form (or equivalent name) (see Section YY page ZZ) (for example: FAA form 8010-4) will be completed as listed on (company name) standard operating procedures (manual name) and sent to the ANAC.
- d) The QA Manager is responsible for preparing and submitting this report to the address previously mentioned on (Section XX – Introduction, paragraph ZZ of this supplement).
- e) An alternative way of malfunction or defect notification can be done by filling out GGCP online report available at Submission Form Instructions web link of the address [http://www.anac.gov.br/certificacao/SDA/Default\\_old.asp](http://www.anac.gov.br/certificacao/SDA/Default_old.asp).
- f) After submittal, an electronically signed copy of report mentioned on above item will be available for printing when the communication is finished and it can be used as a sending receipt.

#### C.3.5.16 Work report

- a) This part of the Supplement is to describe the procedures the foreign MO will use to ensure that the work performed in Brazilian products in accordance with the foreign MO manuals supplement is reported to the ANAC. This report shall include as applicable, the name of the brazilian customer, product identification, model, registration marks or serial number and the scope of the work performed.
- b) This procedure must specify how the report shall be supplied to ANAC.
- c) Reports must include the following:
  - I - (Name of company) shall report to the ANAC, during the re-certification process or whenever requested by Brazilian Civil Aviation Authority, a summarized report about all the maintenance has been performed on Brazilian aeronautical products (RBAC 145.221-I(a)). This report shall include the name of the customer, aeronautical product part number, model and serial number as well as the scope of the work performed.

- II - ([Name of company](#)) shall supply the ANAC, upon its request, a list of the authorized personnel dealing with Brazilian aeronautical products (RBAC 145.221-I(b)).

### C.3.6 **Organization and procedures for MO training**

These parts of the supplement should bring the OM's training provisions regarding specific issues raised by the different procedures introduced by Brazilian certification. These subjects should be used as necessary to supplement the original set of manuals in order to achieve compliance with Brazilian regulations. The following structure is recommended:

- a) Manual procedures and regulations training;
- b) Human Factors Training Programme;
- c) Dangerous Goods

#### C.3.6.1 **Manual procedures and regulations training**

- a) In order to maintain compliance with Brazilian Regulations, initial, recurrent and remedial training shall be conducted on Brazilian Supplement and on the applicable RBAC and IS, by a properly qualified individual for those personnel who deal with Brazilian aeronautical products. The basic reference is the MO training program approved by its primary local civil aviation authority.
- b) For the authorized personnel who approves the return to service ([see Section XX](#)) this training will be done before the approval for return to service of any Brazilian aeronautical product.
- c) A copy of Attendance and/or Examination records shall be maintained on file in the employees training records in the QA office.
- d) A copy of the Attendance and/or Examination records can also be sent to the address referred ([in Section XXX](#)), upon ANAC request.

#### C.3.6.2 **Human factors training programme**

This part of the Supplement describes the human factors training program provided for all technical personnel. This part may contain a cross reference to the appropriate section of the MO manual if that document contains a human factors training program that meets the requirements of the MO manuals.

#### C.3.6.3 **Dangerous goods**

Section 145.53(d) of RBAC 145 stands that there is a part of the supplement setting the procedures for MO that has any involvement with dangerous goods manipulation, including the declaration to ANAC prior certificate emission.

### C.3.7 **Safety Management System – SMS (SGSO)**

Section 145.214-I sets requirements for the foreign MO and the accountable manager relating the Safety Managing System –SMS (Sistema de Gerenciamento da Segurança Operacional – SGSO).

### C.3.8 **REPLACEMENT PARTS TO BE INSTALLED ON BRAZILIAN AIRCRAFT AND ITS RELATED ARTICLES**

- C.3.8.1 Whenever a Brazilian operated aeronautical product is subjected to any type of maintenance and it is about to be re-installed on the same or different Brazilian aircraft, such maintenance can only be accomplished by an ANAC certified maintenance organization.
- C.3.8.2 However, an exchanged part provided by a (National Civil Aviation Authority), FAA/EASA or ANAC certified maintenance organization is acceptable, since it has the related traceability form (authorized release certificate or other document which can act as an export airworthiness approval) and additional technical records, as necessary. Also, for new parts, an authorized release certificate issued by the manufacturer or another person with the appropriate authority can be used for traceability when this part will be installed on Brazilian aircraft/products.
- C.3.8.3 If there is no Brazilian certified repair station capable of performing the desired type of maintenance on Brazilian aeronautical products, (Company name) will request the owner/operator (who is primarily responsible for airworthiness according to Brazilian civil aviation regulations) to obtain an ANAC authorization (as described in RBAC 43, Section 43.1(e)-I) for sending such part to a non-Brazilian certified facility capable of doing such work. However, that non-Brazilian certified repair station has necessarily to be certified by (any Civil Aviation Authority Abbreviation) and the ANAC authorization document must be included in Brazilian aeronautical product work order package.

### C.3.9 **ANAC FORMS**

Finally, if MO finds useful to have relevant forms used on work, this section could be used to present the manuals that are relevant for work on Brazilian articles. The following list refers to forms raised by Brazilian regulation that may be used by MO:

- a) Record of Major Alterations / Repairs (see IS 43.9-001) ANAC Form F-400-04: <http://www2.anac.gov.br/certificacao/Form/Form.asp>;
- b) Authorized Release Certificate/Airworthiness Approval Tag (see IS 43.9-002) ANAC Form F-100-01: <http://www2.anac.gov.br/certificacao/Form/Form.asp>; e
- c) ANAC Defect Report (See ANAC IS 00-001).

**APPENDIX D - ANAC AUDIT FEES PAYMENT PROCEDURE**

- D.1 When required by ANAC, during the initial or renewal certification process, the (**Company name**) will pay the related fee.
- D.2 As per ANAC Financial Manager directives, the current procedures for payment of fees as those required for (**Company name**) COM requires the amount to be wired to a Banco do Brasil account using the data below:

Account #: 001160710001705008 (fill in the full 18 digits code)  
SWIFT code: BRASBRRJBSA  
Special instructions: Identificador1 #12200200001220809 and the CNPJ ANAC/FUNDO AEROVIÁRIO – 08471457000196

- D.3 Normally, the Banco do Brasil address is not necessary for the payment of ANAC fees. But in case it is still needed for performing such financial operation the company must contact

Bank: Banco do Brasil  
Sector: GECEX  
Address: SBS QD1 BLA LT23 - Edificio Sede 1 - Sobreloja  
Zip Code: 70073-900  
City: Brasilia  
State: DF  
Country: Brazil  
Phone: 55 61 3310-5692  
FAX: 55 61 3310-8831

- D.4 (**Company name**) must send ANAC a notice of payment including the copy of payment voucher/bank receipt, after payment is done.
- D.5 This procedure or the one available at <http://www.anac.gov.br/gruOrientacoes.asp>, whichever is the most current, are the only ones to be adopted when paying ANAC fees.
- D.6 The fee amount, which necessarily must be paid in Brazilian currency (Reais) and can be accessed in the follow web links:
- <https://sistemas.anac.gov.br/gruinternet/ControladorGru?cmd=BuscarAreaInteresse>  
(for “Escolha a área de interesse.”; choose: “TABELA DE SERVIÇOS”)
  - [https://sistemas.anac.gov.br/gruinternet/ControladorGru?cmd=ListarAreaInteresse&campo=CODIGO\\_SERVICO&pr=121](https://sistemas.anac.gov.br/gruinternet/ControladorGru?cmd=ListarAreaInteresse&campo=CODIGO_SERVICO&pr=121)
  - [https://sistemas.anac.gov.br/gruinternet/ControladorGru?cmd=ListarAreaInteresse&campo=CODIGO\\_SERVICO&pr=151](https://sistemas.anac.gov.br/gruinternet/ControladorGru?cmd=ListarAreaInteresse&campo=CODIGO_SERVICO&pr=151)
- D.7 The current fee values and their respective codes are shown in the table presented below, and also it can be checked at: <http://www2.anac.gov.br/empresas/certificado.asp>

| <b>Maintenace Organization location</b> | <b>Amount (in Brazilian currency)</b> |                          |
|---|---------------------------------------|--------------------------|
|   | <b>Initial Certification</b>          | <b>Re-certification</b>  |
| South America                           | R\$ 17.000,00 (code 162)              | R\$ 12.500,00 (code 133) |
| Other countries                         | R\$ 17.000,00 (code 162)              | R\$ 15.000,00 (code 132) |