
Aprovação: Portaria n° 917/SAR, de 14 de abril de 2016.

Assunto: Certification of Foreign Maintenance Organization.

Origin: SAR/GTPN

1. SUBJECT

This supplementary instruction- IS clarifies, provides guidance and details the foreign Maintenance Organization - MO certification procedures of ANAC under the Brazilian RBAC 145.

Note 1 - According to art. 14 Resolution No. 30, § 1, applicants wishing, for any purpose, demonstrate compliance with the requirement in RBAC can adopt the methods and procedures previously specified in IS or present reasoned alternative means, demanding, in this case the analysis and express consent of the ANAC. The § 2 of the same article states that the alternative means of compliance should ensure at least an equivalent level of safety to those established by the applicable requirement or realizing the goal of the standard procedure in IS.

Note 2 - 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 3 - this English version is a courtesy provided by ANAC In case of divergence, the Portuguese version of this IS shall prevail.

2. REVOCATION

This IS replaces and supersedes IS 145-002A.

3. LEGAL BASIS

- 3.1 In accordance with art. 70 of law n° 7.565, of December 19, 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 n° 11.182, of September 27, 2005 ANAC is responsible to precede and issue certifications, to approve and provide authorizations regarding activities related to Brazilian civil aviation safety jurisdiction.
- 3.3 Resolution n° 30, of May 21, 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 Whereas foreign and domestic MO certification process are the same in nature, foreign MO certification process has some special characteristics which are considered:

- a) Geographic distance from Brazil which results in a restricted number of audits performed by ANAC; and
- b) The existence of a local civil aviation authority that acts as the primary certification authority. This CAA has conditions to provide continuous surveillance over the foreign MO more effectively than ANAC's surveillance by any means.

5.1.2 Considering the above characteristics, a special set of rules are considered, providing maximum use of the information and surveillance means already available from the relationship with 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 Acceptance of maintenance tasks performed by foreign MO without ANAC certification (except for whole aircraft, aircraft engine and propeller services)

5.2.1 In accordance with RBAC 43, paragraph 43.17 (b)-I, a foreign MO that is not certified by ANAC may perform preventive maintenance, rebuild and alteration and approve article return to service, not including whole aircraft, aircraft engine and propeller, if, among other requirements detailed on the referred paragraph:

- a) Regulatory system regarding aeronautical products maintenance activities should be considered similar between Brazil and local Civil Aviation Authority (CAA)
- b) Maintenance Organization should hold a valid and regular certificate issued by local CAA with adequate capability regarding services to be performed.

5.2.2 Maintenance Organizations matching conditions of paragraph 5.2.1 above are not required to be certified according to the instructions described on this IS.

5.2.3 It is important to emphasize that regulatory similarity must be formally declared by ANAC. This declaration is made by ANAC through Portarias (Ordinances) (only in Portuguese), see website: <http://www2.anac.gov.br/biblioteca/portarias.asp>.

Note – Questions regarding regulatory compatibility must be sent to: foreign145@anac.gov.br.

5.3 Foreign MO certification when FAA is the primary authority

- 5.3.1 Considering MO certification according to this IS instructions, ANAC considers FAA aeronautical & product maintenance regulations to be equivalent to Brazilian regulation established by RBAC 145.
- 5.3.2 Based on paragraph 145.53(b)-I of RBAC 145, ANAC may consider, as its own, the finding of requirement compliance of each foreign MO certified in the United States, if the local certification authority is FAA.
- 5.3.3 ANAC also may, in accordance with RBAC 145 paragraph 145.53(b)-I, consider the set of requirements related to aeronautical maintenance established by other Civil Aviation Authorities (outside those requirements that are specifically mentioned in the paragraphs 5.3.1 e 5.3.2 of this IS) as equivalent to the RBAC 145 set of requirements, so that ANAC also may make use of such findings in the compliance check phase of the foreign MO with the Brazilian aeronautical maintenance requirements.
- 5.3.4 Based on it, in the text of this IS will be highlighted points in which such compliance evidences may be used.
- 5.3.5 ANAC considers the local civil aviation authority to be the one that is directly responsible for the local MO certification and surveillance. Example: FAA is the local civil aviation authority for the MO located in the United States.

5.4 The certification process

- 5.4.1 A foreign MO certification process is covered by the following activities:
- 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 section 5.3 of this IS, regarding audit performed by FAA, ANAC may use these audits results to perform requirements find compliance. In this situation, activities c) to g) are not applicable.

5.4.2 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 address available at <http://www2.anac.gov.br/empresas/certificado.asp>

Note - additional copies may be forwarded to foreign145@anac.gov.br

- c) The foreign MO must provide the following documents, that must be addressed to ANAC altogether with the application, for analysis of ANAC's technical team from Superintendência de Aeronavegabilidade – SAR:

- I - Maintenance Organization Certificate – COM proposal (ANAC Form F-900-71 see <http://www2.anac.gov.br/certificacao/Form/Form.asp>), including the 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 ratings other than those already certified by its own local civil authority, except the specialized services rating from section 145.59 of the RBAC 145. Specialized service rating, as described on RBAC 145, will be evaluated to be equivalent to the respective MO limited rating certification obtained with its own local CAA.

Note 2 – the MO accessory 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 rating - see section 145.59 of RBAC 145.

- II - Operation Specifications – 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, equipment and/or specialized services the MO intend to perform maintenance, preventive maintenance, rebuilding and alteration;

Note - an EO submitted to ANAC must not contain aircraft, engine, propeller, equipment and/or specialized services (as described on section 145.59 of RBAC 145) other than those already certified by its own local CAA.

- III - Capability List – LC proposal, containing the equipment (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.

Note – Considering that in Brazil ANAC only conducts limited MO certification (equivalent to FAA's "limited rating") even for cases which MO receives, from its local CAA, a certification which allows a wide work

scope within a category (equivalent to FAA's "class rating") a capability list, containing the articles to which the MO intends to perform maintenance, must be submitted.

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 who demonstrate to be able to read and understand Portuguese language whenever it is necessary to accomplish tasks that must comply with the Brazilian regulations. This requirement is also important in regarding maintenance records in Portuguese.

V - Evidences regarding the person appointed as Accountable Technician (RT) (appointed on form F-900-73, see item 5.4.3(a)):

- course on the most complex article included on Ops Specs or compatible practical experience with the maintenance services listed on certificate and Ops Specs.

- 3 (three) years of experience on professional activities related to aeronautical products maintenance

Note 1 - section 145.151(a)-III of RBAC 145 requires foreign MO to present an employee who will technically represent it to ANAC, similarly as required by paragraph 145.151(a)-I to local Brazilian MO.

Note 2 – The evidence regarding experience of 3 years may use professional experience acquired on different functions related to OM's work like maintenance execution, inspection, supervision, return to service approval, work as engineer or maintenance planning or quality control/assurance performed on aircraft maintenance companies. The experience time may consider the sum of split periods to compute the 3 years interval.

VI - A signed statement by the Accountable Technician referred on item V above, including:

- list of all tools, equipment, test equipment, bench tests necessary for the safe performance of work ; and

- list of the technical documents necessary for the safe performance of work

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

VII - Copy of Foreign MO Certificate and EO or equivalents, issued by primary local CAA;

- VIII - Letter issued by a Brazilian operator or Brazilian MO stating the intent of using the applicant MO services, in accordance with section 145.51(c)(1) of RBAC 145;
- IX - Compliance Check List regarding the requirements of RBAC 43, RBAC 120 (Subpart H) and 145 with the cross-reference to the manuals and to the Brazilian supplement.

Note 1 – the compliance checklist is a fundamental 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 with its manuals, accepted or approved by its own local CAA, 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 guidance for it.

Nota 2: the Appendix D of this IS presents the RBAC 120 foreign MO applicable requirements that must be part of the contents of the compliance checklists. The compliance, with the applicable requirements of the RBAC 120, may be shown from the evidence of compliance acceptance of the local requirements regarding to prevent the use of drugs and alcohol (psychoactive substances).

- X - Copy of manuals required by the local CAA: current revision of MO's manuals accepted or approved by the local civil aviation authority, which are required for MO local CAA certification, ex.: handbook or manuals of maintenance organization, of quality control and training program.

Note - the manual copies, required by the local CAA herein referred, accepted or approved by this CAA are accepted by ANAC.

- XI - 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 C of this IS could be used as a guidance in developing the Brazilian supplement to the manual (or manuals) of MO;

Note 1 - 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 may be provided in English or Portuguese as well.

Note 2 - 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 with requirements related to manual.

- XII - List of subcontracted maintenance function (certified and non-certified maintenance organizations) approved by the foreign MO local civil aviation authority.

Note 1 - the same subcontracted maintenance functions may be accepted by ANAC. The list may be presented with the Brazilian Supplement.

Note 2 - only organizations certified by ANAC are considered as certified by RBAC 145.217. Work performed by person only certified by other civil aviation authorities is considered a non-certified person's work.

- XIII - Other documents required by paragraph 145.51(a)

- XIV - TFAC proof of payment.

Nota 1 – the TFAC fee was established by Law 11.182/2005, article 29. In the Law annex III are listed the situations that the payment is necessary.

Note 2 - The procedures and information regarding TFAC fee value is found at website: <http://www2.anac.gov.br/empresas/certificado.asp>

5.4.3 Certification application and documents analysis

- a) Upon receipt of the certification application and documents, 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 correctives 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 activity will be closed when the ANAC issues a document (ofício) stating that all application documents have been considered acceptable or approved (as the case).

5.4.4 **Audit scheduling:** this phase initiates with the foreign MO proposed receiving. 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 MO cases included in section 5.3 of this IS, the certification audit promoted by its local authorities will be used for requirement accomplishment and, by this way, sections 5.4.4, 5.5.5, 5.4.6, 5.4.7 and 5.4.8 of this IS will be considered not applicable.

5.4.5 Audit scheduling confirmation

- a) A document (ofício) will be sent to the MO, with the audit team members, 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 (Portuguese only), regarding the audit procedures.

5.4.6 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 MOs 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 finish 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 ANAC's office.

Note – the preliminary report will inform that a final report, containing all non-conformities, will be issued later via ofício (official communication from ANAC).

5.4.7 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 including the necessary corrective action plan – PAC before the issuance of the Certification document. If nonconformity items are not raised, the certification documents will be issued.

5.4.8 Nonconformity corrective plan: if there is any nonconformity item raised in the audit finding report, the MO must address the nonconformity items by nonconformity corrective action plan. This plan must present the correction to the nonconformity raised, identify the (likely) root causes of each item and a proposal of correction actions for the root causes.

5.4.9 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;
 - V - Training Program Approval, if such a document was not previously approved by the local Civil Aviation Authority;
 - VI - Official communication from ANAC to the foreign MO primary Civil Aviation Authority to inform the certification.
- 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 – based on section 5.3 for any MO, since the audit is not applicable, the installations addresses considered in the petition to ANAC will be those already certified by its local authority.

5.5 Certification renewal process

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

- 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 – based on the MO included in section 5.3 of this IS, the certification audit promoted by its local authorities will be used for requirement accomplishment and, by this way, the activities c) to g) are considered not applicable.

5.5.1 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 para-

graph 5.4.2 b) of this IS. Those 60 days are necessary to ANAC internal procedures to process the application, preventing the COM expiration.

Note – if the MO does not submit its renewal application before COM expiration date, it will be considered revoked. In order to recover certification, the MO should apply for a new certificate, in accordance with section 5.4.2 of this IS,

b) The application for certificate renewal must include the following documents:

- I - The COM, EO, e LC accepted by the local civil aviation authority, or equivalent documents issued by that authority, If any alteration was implemented after the Brazilian certification (or last certification renewal);
- II - Letter stating any proposed changes to the Brazilian COM, EO e LC (all pertinent documents listed in section 5.4.2 of this IS must be updated);
- III - Letter from a Brazilian operator or Brazilian MO with statement of intention for use of the applicant MO services, in compliance with the RBAC 145 paragraph 145.51(c)(1); e
- IV - Corresponding fee payment receipt - TFAC.

Nota 1 – the TFAC fee was established by Law 11.182/2005, article 29. In the Law annex III are listed the situations when the payment is necessary.

Note 2 - The procedures and information regarding TFAC fee value is found at website: <http://www2.anac.gov.br/empresas/certificado.asp>.

5.5.2 Renewal application and documents analysis

- a) After receiving the renewal certificate application, 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 MO 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.

5.5.3 **Audit scheduling** - Same as 5.4.4

5.5.4 **Audit scheduling confirmation** - Same as 5.4.5

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

5.5.5 **Audit** - Same as 5.4.6

5.5.6 **Audit finding report** - Same as 5.4.7

5.5.7 **Nonconformity correction plan** - Same as 5.4.8

5.5.8 **Documents issued for certification renewal**

a) After all nonconformity items are corrected or addressed by an acceptable method, the ANAC's Superintendence of Airworthiness – SAR will issue, as applicable, due to revisions, 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 MO manual (or manuals, if applicable).

V - Training Program Approval, if such a document was not previously approved by the local Civil Aviation Authority;

VI - Official communication from ANAC to the foreign MO primary Civil Aviation Authority to inform the certification.

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 considered during the certification process.

5.6 **Certificate amendment and change process**

5.6.1 **Certificate amendment: a certificate holder must apply to ANAC** an amendment to it. The amendment must be applied 30 (thirty) days before the intended effective day:

a) **MO ownership transfer:** For a certificate amendment, the applicant has to submit the foreign MO property alteration to ANAC, fill and mail the certificate proposal (see paragraph 5.4.2(c)(I) of this IS), without any new class-rating changes. The mailing address is the same already presented at section 5.4.2(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.

5.6.2 **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) business days and ANAC may establish additional limitations or even a suspension if it's found that the MO has no condition to sustain its certification.

- a) **MO address change:** For a foreign MO addresses alteration, the applicant has to submit the address alteration to ANAC, fill and mail the certificate proposal with the new address in accordance with paragraph 5.4.2(c)-I of this IS. The alteration cannot include class rating already certified. The ANAC address to mail the documents is the same of 5.4.2(b) of this IS.

Note 1 – the certificate alteration proposal to ANAC with the address change has to be mailed together with a copy of the certificate containing the new address already changed by the local CAA. If MO manuals have been revised to show the address alteration, those revisions have 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 5.4.4 of this IS. Foreign MO already certified by FAA, in terms of section 5.3, are exempt from this audit process to check adequacy of the new address installations.

- b) **adding and amending an MO rating:** the following alterations in class-rating are considered for:

I - **EO alteration** (inclusion of 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 all requirements necessary: the installations, special tools, technical data access, the personnel qualification, the manual revision, as required and the applicable fee payment receipt (TFAC). The process follows the same activities of section 5.4.2 of this IS.

II - **CL alteration:** each CL alteration request must be ANAC addressed, unless otherwise determined by the ANAC (ANAC may grant an auto inclusion 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 submit to ANAC, unless to the foreign MO the auto inclusion was previously granted. Considering an article inclusion, the foreign MO must present all necessary information 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 5.4.2 of this IS. After the proposal analysis, the new CL can be accepted by ANAC in accordance with section 5.4.9(a) of this IS, unless the CL was previously accepted by auto inclusion.

6. APPENDIX

Appendix A – Acronyms list.

Appendix B –RBAC 145 to 14CFR Part 145 differences summary.

Appendix C – The Brazilian supplement to the manuals.

Appendix D – Applicable RBAC 120 requirements for foreign MO.

7. FINAL CONSIDERATIONS

- 7.1 The changes markups were intentionally hidden, due to extension of the changes implemented in this revision.
- 7.2 The MO must work with a term of 90 (ninety) days for presenting evidence of required actions during all the process phases as well as the answers for each communication of non-conformity, following as much as possible, the chronology of events as agreed in the certification schedule. Any process with pending items, left without communication from the Maintenance Organization for more than 90 (ninety) days will be cancelled. If the answer to a same non-conformity is rejected for the third time, the certification process will be terminated forcibly, regardless of the previous term.
- 7.3 Revision B of IS 145-002, does not require that foreign MO already ANAC certified revise its documents (example: manuals, forms, etc.).
- 7.4 The omitted cases will be settled by the ANAC.
- 7.5 This Supplementary Instruction – IS is enforced at its issuance date.
- 7.6 **Infraction to provisions of the Brazilian Aeronautical Code – CBAer:** Infractions to provisions of CBAer, including the obligation to comply with regulations issued by ANAC, can motivate the application of administrative penalties. In that case, ANAC will issue an “Auto de Infração” (AI). Procedures regarding AI communication and appeal are contained on IN N°. 8/2008 (in Portuguese only).

APPENDIX A - ACRONYMS LIST**A.1 ACRONYMS**

AD	Airworthiness Directive
AI	Infringement Notice
ANAC	National Civil Aviation Agency
APRS	Approval to Return to Service
APU	Auxiliary Power Unit
ARSO	Risk Activities for Operational Safety in Civil Aviation
BPS	Service and Personnel Bulletin
CAA	Civil Aviation Authority
CBAer	Brazilian Aeronautical Code
CL	Capability List
COM	Maintenance Organization Certificate
CST	Supplemental Type Certificate (STC)
DIAM	Annual Maintenance Inspection Declaration
EA	Airplane Specifications (TCDS)
END	Non-destructive inspection
EO	Operation specification
ETSP	Drug Testing of Psychoactive Substance
FAA	Federal Aviation Administration
GGCP	Anac, Aeronautical Product Certification Branch
GR	Accountable Manager
IAM	Annual Maintenance Inspection
ICAO	International Civil Aviation Organization
INMETRO	National Institute of Metrology, Quality and Technology
IS	Instrução Suplementar/ Supplementary Instruction
MPR	Inspector Procedures Handbook

MO	Maintenance Organization/Repair Station
MOM	Maintenance Organization Manual
PAC	Corrective Action Plan
P/N	Part Number
PPSP	Prevention Program Associate with the Abuse of Psychoactive Substances in Civil Aviation
QM	Quality Manual
RBAC	Brazilian Civil Aviation Regulation
RBHA	Brazilian Aeronautical Certification Regulation
SAR	ANAC's Superintendence of Airworthiness
SARP	Standard and Recommended Practices
SMS	Safety Management System
STC	Supplemental Type Certificate
TCDS	Type Certificate Data Sheet
TFAC	Civil Aviation Inspection Tax

APPENDIX B - RBAC 145 TO 14CFR PART 145 SUMMARY OF DIFFERENCES

- B.1 This appendix presents a summary of differences between the Brazilian RBAC 145 and the 14CFR PART 145, regulation related to certification of maintenance organizations issued by the USA, since this regulation is well-known by international community, this appendix enable ANAC COM applicants to adequately understand the Brazilian regulation peculiarity and adequately address it on the required Compliance Check List.

Note – The following text is, by no means, a translation between 14CFR PART 145 and RBAC 145.

B.2 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.1 AND 14CFR PART 145.1 – APPLICABILITY

- B.2.1 RBAC 145 brings on its section 145.1 the transition dates in which MO already certified by should comply with specific sections of RBAC 145 (new ANAC's COM applicants are already required to comply with all requirements). Considering the date this IS has been issued, please check if the following dates should be applicable to a foreign MO:

- a) Up to September 8 2014: paragraph 145.163(a) and 145.209(e) of RBAC 145, regarding training program approval.
- b) Up to March, 8th 2015, paragraphs:
 - I - 145.51(a)(1)-I, issuance of a revised Compliance Check list updated to reflect changes from RBHA 43/145 to RBAC 43/145;
 - II - 145.53(d) and 145.165(b): training and compliance statement regarding MO personnel training on HazMat training according to ICAO guidance;
 - III - 145.153 (b)(2)-I(i), minimum experience time for supervision personnel;
 - IV - 145.161(a)(2), availability, to ANAC, of a list containing all inspection personnel;
 - V - 145.209 (d)(2), issuance of procedures regarding self-evaluation for capability list revision; and
 - VI - 145.209(h), issuance of procedures regarding management of contracted maintenance as required on section RBAC 145.217.
- c) Up to March 8 2016, paragraph A145.1(g)(ii) of Appendix A-I of RBAC 145, regarding minimum experience time for the Accountable Technician required by RBAC 145.151.

B.3 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.3 AND 14CFR PART 145.3- DEFINITION OF TERMS.

- B.3.1 The following definitions have different interpretation on Brazilian regulations. These differences must be considered in the requirements compliance analysis for the preparation of the Brazilian supplement.

- a) **Accountable Manager:** The Accountable Manager in Brazil is also responsible for the SGSO (SMS).
 - b) **Directly in charge:** this definition in Brazil, also applies when dealing with non-certified persons.
 - c) **Line Maintenance:** Brazilian definition of line maintenance is based on EASA definition.
 - d) **Accountable Technician:** Brazilian regulations include a requirement for MO to indicate an employee as an Accountable Technician. Details regarding acceptable personnel on foreign MO may be found on paragraph 5.4.2 of this IS (sub item (c)IV -, Note 2).
- B.4 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.5 AND 14CFR PART 145.5 – CERTIFICATE AND OPERATIONS SPECIFICATIONS**
- B.4.1** RBAC 145 and 14CFR PART 145, in some of its sections, have provisions which require the applicant to comply with specific prescriptions like the requirement for availability of the certificate for public and authority inspection and the allowance for authorities free access on MO's premises.
- B.4.2** Regarding such sections, the applicants should issue policies and procedures (that may be present on the manuals or the Brazilian supplement) to ensure ANAC has a treatment equivalent to the local CAA.
- B.5 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.51 AND 14CFR PART 145.51 - APPLICATION FOR CERTIFICATE**
- B.5.1** Certification application in Brazil requires a set of documents which is different to those required for application in the USA. The documents required to be submitted by foreign MO for ANAC certification are listed on section 5.4.2(c) of this IS. This list reflects the documents required by section RBAC 145.51.
- B.6 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.53 AND 14CFR PART 145.53 - ISSUE OF CERTIFICATE AND 14CFR PART 145.107 – SATELLITE REPAIR STATIONS**
- B.6.1** According to RBAC 145.53 (b)-I, ANAC may use compliance data, like certificates issued by other CAA, if ANAC considers the CAA regulations to be similar to RBAC. This subject is detailed on section 5.2 of this IS.
- B.6.2** Regardless if it is a foreign or Brazilian MO, in case of providing maintenance, preventive maintenance and alteration for any holder of a Brazilian certificate, in compliance to the RBAC 121 or RBAC135 operation requirements, the MO shall present to ANAC a statement that all MO personnel has been trained in the foremost edition of the Technical Instructions for the Safe Transport of Dangerous Goods by ICAO.
- B.6.3** Brazilian MO with multiple locations may have just one certificate for each location been necessary just an individual operations specification. In addition, there is no restriction on establishing premises in other countries.
- B.6.4** Specifically to Brazilian MO that has premises located outside Brazil, RBAC 145.53(b)-II

defines that the same requirements applicable to MO located in Brazil are applicable to them.

B.7 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.55 AND 14CFR PART 145.55 - DURATION AND RENEWAL OF CERTIFICATE:

B.7.1 COM issued to foreign MO will last for 24 months.

B.7.2 In order to make use of reduced paperwork and fee when compared to initial certification, the foreign MO must issue its renewal application before 60 (sixty) days before expiration date. Otherwise, the MO must apply again for initial certification process according to RBAC 145.51. This subject is covered on paragraph 5.5.1 of this IS.

B.7.3 This section of RBAC 145 also defines situations when the certificate may be suspended and revoked. Subsection 7.5 of this IS also brings information regarding infractions to Brazilian Aeronautical Code which may led to other administrative penalties.

B.8 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.57 AND 14CFR PART 145.57 - AMENDMENT TO OR TRANSFER OF CERTIFICATE

B.8.1 RBAC 145 defines that a certificate amendment shall be required by MO to ANAC if the organization changes its corporate name. It also defines specific timeframes for issuance of the application.

B.8.2 This section of RBAC 145 also states that ANAC may limit the MO work scope if it does not show conditions to keep certification levels.

B.9 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.59 AND 14CFR PART 145.59 - RATINGS AND RBCAC 145.61 AND 14CFR PART 145.61 - LIMITED RATINGS:

B.9.1 According to RBAC 145.61, ANAC COM is only issued with limitations. ANAC may issue limitations for a particular make and model like FAA but these limitations are classified according to the ratings described on RBAC 145.59.

B.9.2 Ratings definitions of RBAC 145.59 differs from 14CFR PART 145.59:

- a) for airframe ratings use maximum takeoff weight (MTOW) to distinguish between small and large aircraft (small aircraft is defined as airplanes with MTOW lower than 12500 lbf (5670 kgf) and rotorcrafts with MTOW lower than 6018 lbf (2730 kgf); and
- b) services like NDT are included on specialized services class. RBAC 145.59(g)-I brings more examples.

B.10 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.103 AND 14CFR PART 145.103 - HOUSING AND FACILITIES REQUIREMENTS

B.10.1 RBAC 145 imposes additional housing and facilities requirements as applicable to the work scope of the MO:

- a) ventilation, illumination, environmental control (temperature, humidity, etc.) needed to ensure adequate storage of parts and materials;

- b) adequate and isolated location for flammable storage with blinded electric installation as needed;
- c) isolated location for installation of compressed air vessels as needed; and
- d) protection cage designed to contain a fail on the largest uninstalled wheel-tire set during its pressurization, as applicable.

B.11 COMMENTS ON 14CFR PART 145.107 - SATELLITE REPAIR STATIONS

B.11.1 Satellite MO certification procedures have been discussed on section B.6.

B.12 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.109 AND 14CFR PART 145.109 - EQUIPMENT, MATERIALS, AND DATA REQUIREMENTS

B.12.1 Regarding equipment, materials and data, RBAC 145 additionally requires

- a) a list of all equipment owned by MO and contracts or equivalent document that authorizes use of the equipment. Such documentation must be kept for, at least, 5 years, since last time equipment has been used.
- b) Means to control if calibration of equipment used on airworthiness determination of an article, is still valid. These control system should generate records which must be kept for, at least, 5 (five) years or the latest 2 (two) calibration.
- c) Equivalency of equipment must be substantiated through a report developed according to IS 43.13-005 (Portuguese only).
- d) Availability of technical data through subscription or authorization for its use. Guidance on the subject is available on IS 145.109-001 (Portuguese only). Applicable Brazilian aeronautical legal documents are also required.

B.13 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.151 AND 14CFR PART 145.151 - PERSONNEL REQUIREMENTS:

B.13.1 RBAC 145 requires MO to have an employee designed as an Accountable Technician. Section B.3 brings discussion on definition of the Accountable Technician. The Accountable Technician and Accountable Manager may be the same person.

B.13.2 the foreign MO must have qualified personnel (at least one person) who are able to read and understand the Portuguese language on written documents, whenever necessary to understand Brazilian regulations, Supplemental Instructions, and Airworthiness Directives. This requirement is also important regarding Maintenance Records in Portuguese.

B.14 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.153 AND 14CFR PART 145.153 - SUPERVISORY PERSONNEL REQUIREMENTS:

B.14.1 According to RBAC 145, any employee designated to be part of supervisory staff must:

- a) Be an ANAC's RBHA 65 (or other regulation in lieu thereof) license holder, on Brazilian MO or have adequate training and experience on foreign MO (a local CAA mechanic license would be acceptable)
- b) Comply with requirements of RBAC 145.153(b)(2):

- B.14.2 Supervisory personnel must be able to read technical data of articles, listed on the MO's operations specifications, in the language it is presented.
- B.15 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.155 AND 14CFR PART 145.155 - INSPECTION PERSONNEL REQUIREMENTS:
- B.15.1 According to RBAC 145, besides the requirements from 14CFR PART 145, any employee designated to be part of inspection staff must:
- a) Be an ANAC's RBHA 65 license holder, on Brazilian MO or have adequate training and experience on foreign MO (a local CAA mechanic license would be acceptable) if directly involved on tasks of maintenance, preventive maintenance or alteration.
 - b) Besides proficiency in using various types of inspection equipment and visual inspection aids as appropriate, must have been trained or have 18 months of practical experience on inspection work.
- B.15.2 Inspection personnel must be able to read the language the technical data of articles listed on the MO's operations specifications.
- B.16 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.157 AND 14CFR PART 145.157 - PERSONNEL AUTHORIZED TO APPROVE AN ARTICLE FOR RETURN TO SERVICE:
- B.16.1 According to RBAC 145, besides the requirements from 14CFR PART 145, any employee authorized to approve an article for return to service must:
- a) Be an ANAC's RBHA 65 license holder, on Brazilian MO or have adequate training and experience on foreign MO (a local CAA mechanic license would be acceptable).
 - b) able to read the language the technical data of articles listed on the MO's operations specifications.
- B.17 COMMENTS ON 14CFR PART 145.159 - RECOMMENDATION OF A PERSON FOR CERTIFICATION AS A REPAIRMAN
- B.17.1 RBAC 145 does not bring any provisions for the work of someone as a repairman as defined by 14CFR 65.
- B.18 COMMENTS ON 14CFR PART 145.160 - EMPLOYMENT OF FORMER FAA EMPLOYEES
- B.18.1 RBAC 145 does not establish rules to restrict the employment of former CAA employees.
- B.19 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.161 AND 14CFR PART 145.161 - RECORDS OF MANAGEMENT, SUPERVISORY, AND INSPECTION PERSONNEL
- B.19.1 RBAC 145 requires the MO to keep files of registration of Accountable Manager (GR cited on RBAC 145.161) and Accountable Technician (RT cited on RBAC 145.161).

- B.19.2 In case accountable manager and accountable technician quits from MO work, ANAC should be informed no later than 10 (ten) days. A new designation should be issued in up to 30 (days) after quitting.
- B.20 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.163 AND 14CFR PART 145.163 - TRAINING REQUIREMENTS:
- B.20.1 Section B.2 discussed the transition rules for RBAC 145 and defined a date for training program requirements to have effect.
- B.20.2 Training records should be kept for all employees for at least five years after employee dismissal.
- B.20.3 Training for NDT has special instructions that should be reviewed. Check for IS 43.13-003 and 145.163-001 (Portuguese only).
- B.21 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.165 AND 14CFR PART 145.165 - HAZARDOUS MATERIALS TRAINING
- B.21.1 RBAC 145 does not require hazardous materials training, except for those employees designated to deal with RBAC 135 and RBAC 121 certified operators.
- B.22 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.205 AND 14CFR PART 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.22.1 Brazilian regulation does not have a certification similar to part 125.
- B.22.2 Operations of Brazilian aircraft not certified under RBAC 121 and RBAC 135 are performed under RBHA 91 rules. RBAC 145 does not require a different treatment to these aircrafts.
- B.23 COMMENTS ON 14CFR PART 145.206 - NOTIFICATION OF HAZARDOUS MATERIALS AUTHORIZATIONS
- B.23.1 RBAC 145 does not requires any kind of acknowledgment from MO, to RBAC 121 and RBAC 135 certified operators, regarding work on articles related to hazardous materials, as referred by sections 121.1005(e) and 135.505(e) of 14CFR.
- B.24 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.207 AND 14CFR PART 145.207 - REPAIR STATION MANUAL AND, RBAC 145.209 AND 14CFR PART 145.209 - REPAIR STATION MANUAL CONTENTS:
- B.24.1 RBAC 145 establishes a manual system which is similar to the one established by FAA on 14CFR PART 145. The following differences are specific and are expected to be covered by Brazilian supplement, unless already present on the MO manual system, accepted by local CAA.
- a) RBAC 145 requires the duties of personnel responsible to maintaining RBAC 145 certification to be described. Additionally, MO manual should contain the procedures to establish their competences.

- b) Description of the work authorized.
- c) RBAC 145 requires MO to have specific procedures regarding how the MO complies with service difficulties information requirement.
- d) RBAC 145 requires MO to have specific procedures for receiving, accessing, amending and distributing, airworthiness data inside of the organization.

Note – According to RBAC 39, Brazilian regulation for Airworthiness Directives – AD, articles used as part of aircraft registered in Brazil are required to comply with AD issued by ANAC and by State of Design. For example, European products, like AIRBUS aircraft, must comply with both ANAC and EASA AD. Guidance on AD verification and compliance is available on IS 39-001 (Portuguese only).

B.24.2 Detailed guidance regarding MO manuals structure are present on IS 145-009 and IS 145-010 (both in Portuguese only).

B.25 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.211 AND 14CFR PART 145.211 - QUALITY CONTROL SYSTEM:

B.25.1 RBAC 145 also requires the MO's quality control system to control, by the means of a list, the personnel authorized for signing return to service approvals.

B.25.2 Detailed guidance regarding this subject and quality control system in general, is provided by IS 145-009 (Portuguese only).

B.26 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.213 AND 14CFR PART 145.213 INSPECTION OF MAINTENANCE, PREVENTIVE MAINTENANCE, OR ALTERATIONS.

B.26.1 Foreign MO should designate for inspection of maintenance, preventive maintenance or alteration persons who have adequate training and experience, and also have a mechanical licence holder (a local CAA mechanic license would be acceptable as a means of compliance for licencing).

B.27 COMMENTS ON RBAC 145.214-I – SAFETY MANAGEMENT SYSTEM – SMS

B.27.1 RBAC 145 requires Brazilian or foreign MO to develop a SMS in order to implement the ICAO SMS SARPS, part of Annex 19 to the International Civil Aviation Convention.

B.27.2 As a guidance for SGSO implementation, ANAC issued IS 145.214-001 (Portuguese only). This IS has been based on ICAO doc 9859 – Safety Management Manual and brings resources for developing a SGSO considering scalability criteria.

B.27.3 In addition, in order to reach SGSO implementation effective date, March 8, 2019, the IS 145.214-001A recommends deadlines for the deliverables. Foreign MO deadlines are as follows:

- a) Implantation plan submission for acceptance: September 8th, 2016;
- b) SGSO implantation deadline: March 8th, 2018; and

- c) Full SGSO implementation deadline, required by RBAC 145.214-I: March 8, 2019.
- B.28 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.215 AND 14CFR PART 145.215 - CAPABILITY LIST
- B.28.1 RBAC 145 considers that inclusion of new articles into MO work scope should be, as a rule, explicitly accepted by ANAC. MO may only include articles on its work scope, without previous ANAC review, if it proposes specific procedures to be included on its manual system that covers this process thoroughly, and to be accepted by ANAC.
- B.29 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.217 AND 14CFR PART 145.217 - SUBCONTRACT MAINTENANCE:
- B.29.1 Subcontracted maintenance functions previously approved by local CAA are acceptable to ANAC.
- B.29.2 These subcontracted maintenance functions are not limited to functions out of capacity of MO but also for situations when, besides it is capable, the MO wants transfer some of its work to a subcontractor.
- B.29.3 Only MO, certificated by ANAC, is considered to be certificated as referred on this section. MO, certificated by local CAA but not by ANAC, is considered to be a noncertified person.
- B.29.4 Detailed discussion on subcontract maintenance should be checked on IS 145-009 (Portuguese only).
- B.30 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.219 AND 14CFR PART 145.219 – RECORDKEEPING
- B.30.1 RBAC 145 requires MO to keep its records for 5 years instead of 2 years as required by 14CFR PART 145.
- B.30.2 MO procedures and policies should provide means to ANAC access records in order to allow the ANAC inspection of these records.
- B.31 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.221 AND 14CFR PART 145.221 - SERVICE DIFFICULTY REPORTS
- B.31.1 Procedures regarding service difficulty reports should considerate ANAC's acceptable format. Instructions regarding report of service difficulties are available on IS 00-001 (Portuguese only).
- B.32 COMMENTS ON RBAC 145.221-I – RELATÓRIOS PERIÓDICOS
- B.32.1 RBAC 145 requires that Brazilian and foreign MO must submit to ANAC, in determined time intervals, reports regarding work related to its ANAC certification.
- B.32.2 These reports, which should be sent up to the last day of the respective month, are:
- a) monthly report containing services performed by MO,
 - b) quarterly report, listing the technical personnel linked to the MO, regarding the last 3 (three) months.

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- B.33 COMMENTS ON DIFFERENCES BETWEEN RBAC 145.223 AND 14CFR PART 145.223 - ANAC INSPECTIONS
- B.33.1 MO certificated by ANAC should provide policies and procedures, which allow ANAC inspectors, at any time, to have broad access to MO premises.

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 to 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 that will analyze case by case.

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 5.1 of this IS, which brings the need for information from MO'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 Therefore, if the foreign MO set of manuals do not show full compliance with all applicable Brazilian requirements, ANAC requires MO to establish additional or supplemental procedures for MO activities that could achieve requirements compliance. An acceptable mean of compliance by ANAC is to define such procedures 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 built on the basis provided by the procedures already in use by MO.
- C.3.2 Therefore, besides ANAC recommends the following structure to the supplement and respective contents as general use minimum standard, MO 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 are supposed to bring 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) Accountable manager commitment/SMS;

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 MO could only forward the revision to ANAC.
 - f) Example of a section regarding procedures for 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 sections are part of the system ANAC recommends to provide adequate use of the manual and change tracking capability. The MO may use different systems of control and cross-reference if it achieves the same equivalent document handling.

C.3.4.4 Introduction

- a) This part of the Supplement should describe 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.

- b) Whenever conflicting issues result between local CAA and the RBAC and this supplement, the RBACs will take precedence over the local CAA regulations when maintenance services on Brazilian aeronautical products are involved.

C.3.4.5 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.
- c) An acceptable statement might be as follows and must be dated and signed by the accountable manger:

This Supplement defines, in conjunction with the Manual above referenced, the organization and procedures upon which ANAC 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 ANAC and notified to this organization timely.

It is understood that ANAC will list this organization as an acceptable source of maintenance for Brazilian civil aeronautical products under its regulatory control., It is further understood that ANAC may withdraw the certificate, suspending or cancelling any privileges granted to the applicant if it is considered that the accepted procedures are not followed or RBAC 145 certification standards are not maintained.

C.3.5 Maintenance organization general organization and operational procedures

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

- a) General Maintenance Organization procedures
- b) Work Orders/Contracts;
- c) Technical documentation/data;
- d) Tools, Equipment and Materials
- e) Subcontracting;
- f) Off-site Maintenance;
- g) Major repair/alterations
- h) Maintenance Release Of Aircraft Article;
- i) Maintenance Release Of Aircraft;
- j) Personnel responsible to release to service;
- k) Record Keeping;
- l) Annual Maintenance Inspection (IAM);
- m) Aircraft Airworthiness Certificate Renewal
- n) Reporting Of Service Difficulties;
- o) Periodic Reports;

C.3.5.2 **General Maintenance Organization procedures**

- a) This part of the supplement should address MO aspects regarding its internal organization, which is not adequately already covered by MO's manual system to show compliance to all RBAC 145 requirements.
- b) It should include a description of the organization, highlighting the staff required by RBAC 145, specially:
 - I - Accountable Manager, and
 - II - Accountable Technician.
- c) It also should include MO procedures, developed to address RBAC 145 requirements that has are not adequately covered by MO's manual system as well (accepted by its own local Civil Aviation Authority). These procedures should include, but are not limited to:

- I - Procedures regarding designation and succession of accountable manager and accountable technician.(refer to subsections B.13 and B.19 of this IS for discussion on the subject).
- II - Procedures regarding amendment to certificate in accordance to RBAC 145.51 (refer to subsection B.8 of this IS for discussion on the subject).

Note - 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 certification. No address changes will take place without prior knowledge and written approval from ANAC.

- III - Procedures regarding MO certificate renewal, including provisions to ensure the dates presented on RBAC 145.55 are considered (refer to subsection B.7 of this IS for discussion on the subject).
- IV - Procedures regarding compliance with specific Brazilian requirements and those that require special means of compliance for Brazilian certification. For example, providing access to the ANAC staff to installations of OM and availability of COM and EO for consideration of the public and the ANAC inspectors (refer to subsections B.4 and B.33 for discussion on the subject). See below for an examples of procedures herein referred:

DISPLAY OF CERTIFICATE

The ANAC Maintenance Organization COM shall be available for inspection in an area accessible to the general public. This certificate shall be made available for prompt presentation whenever request by the ANAC.

ACCESS BY ANAC PERSONNEL

ANAC-SAR staff must be allowed access to the MO for assuring compliance with procedures and standards and to investigate specific problems.

- d) 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.3.5.3 Work orders/contracts

- a) This part of the Supplement should addresses how the work orders/contracts are made with regard to Brazilian products.
- b) The MO must describe how it is ensured that identification of Brazilian aeronautical articles is made prior to performing any maintenance, alteration or repair. See below a sample procedure:

Whenever a work order is generated for a Brazilian article a statement, as presented below, should be placed on 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.

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

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) Procedures related to creation of work orders/contracts should meet the following criteria:
- 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 specify 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 needs to have access to any applicable ADs for the aeronautical products it will maintain.

C.3.5.4 Technical documentation/data

- a) This section should contain procedures, required by RBAC 145.209 , to maintain, in a current status, the documentation used during each work. (refer to subsection B.12 and B.24 for clarification on subject and, for additional guidance, to IS 145.109-001 – Portuguese only).

Note: As discussed on subsection B.12, the MO should have the property of the technical data or a written authorization from owner. This owner should be the operator if it holds the manual subscription, for example.

- b) This technical library shall contain RBAC, IS, EA (Brazilian TCDS), CBAer and Airworthiness Directives issued by ANAC and by State of Design (refer to note of section B.12 and B.24 note for discussion on the subject).
- c) MO should evaluate, as discussed on subsection B.24 if its procedures already adequately address checking of AD in accordance to RBAC 39.

Note - DA/AD control rests as an owner/proprietary responsibility. Therefore, 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) This part of the supplement should describe special procedures not covered by MO's manual system regarding tools equipment and materials which are required by RBAC 145 (refer to subsection B.12, specially items (a) and (c) for discussion on subject). The section must address procedures that include the following issues:
- I - How MO manage the list required by RBAC 145.109(a)-I?
 - II - If MO uses equipment tools different from those recommended by manufacturer, the manual include procedures to determinate its equivalency? (Guidance on IS 43.13-005 – Portuguese only).
- b) See bellow a sample text for this subject:

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 MO's manuals (reference 145.109(c) of RBAC 145).

(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 or by ANAC.

C.3.5.6 Subcontracting

- a) This part of the Supplement should address the procedures for subcontracting work considering procedures specific to Brazilian articles. MO should have procedures in accordance to RBAC 145.217 (refer to subsection B.29 for discussion on the subject).
- b) Such procedures may be needed to differentiate maintenance functions due to the fact that as highlighted on the note to subsection B.29, only MO certified by ANAC is considered to be certified. It may led to some differences on MOs inner workings since some persons considered to be certificated by local CAA should be not certificated to ANAC.

Note – Subcontract maintenance is supposed to support situations that part of the work will be performed by other organization, certified or not but for which the final airworthiness approval is issued under Contracting MO certification. It means that maintenance operations that use return to service authority from another "subcontracted" MO own certification (usually through an authorized release certificate), does not constitute as a subcontracting as referred by RBAC

145.217. 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 is responsible for the maintenance release of the entire aircraft.

C.3.5.7 Off-site maintenance

- a) This part of the supplement should address the procedures regarding off-site maintenance. Such procedure should include
 - I - If it is necessary to perform work away from the company premise at current address, such work shall not exceed the scope of the ANAC rating.
 - II - Procedures regarding ANAC notification of such work.
- b) The procedures should also address how it is 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;
- c) A person authorized to return to service should be 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.3.5.8 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.
- b) It should comprise procedures on how foreign MO 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.
- c) Major repair performed by the foreign MO to any aeronautical product related to a Brazilian registered aircraft shall be accomplished in accordance with:
 - I - manufacture's approved data,
 - II - data issued by the state of design CAA or

III - data issued by ANAC.

Note: See 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.

- d) 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.
- e) 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 (These IS are written in Portuguese only).
- f) 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>).
- g) The Supplement must specify that in the case of foreign MO major repairs and major alterations of Brazilian products, such repairs and alterations 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).
- h) Certain alterations and repairs are eligible for field approval, accordingly to the policy in force at ANAC and GGCP.
- i) 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.3.5.9 Maintenance release of aircraft article

- a) This part of the Supplement should detail procedures regarding Maintenance release of an aircraft article including complete engines, and propeller with regard to specific procedures for Brazilian products. All applicable regulation of ANAC must be identified in this procedure.
- b) The maintenance records should be performed as to identification that the service has been released under Brazilian MO certification, for example: Block 13 of the Brazilian Authorized Release Certificate. Following is an example of a statement that should be used:

“Released under the Brazilian Maintenance Organization Certificate N°

- c) ANAC Form F-100-01 (“Certificado de Liberação Autorizada/Etiqueta de Aprovação de Aeronavegabilidade”) and Supplementary Instruction (Instrução Suplementar)

IS 43.9-002 should be used always in case of performing maintenance tasks in engine, propellers or other articles.

Note – The process of return to service must be performed in accordance with the provisions of RBAC 43 as applicable to the service performed as well as must be in compliance with any special requirements of the operator.

C.3.5.10 Release of complete aircraft maintenance

- 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 should include information that specify the scope of work performed such as the maintenance check as well as any repairs, modifications, Airworthiness Directives accomplishment and replacement parts together with the identification of the set of technical data used (P/N for instance), as well as contain information about revision of the data used.
- c) The maintenance records should be performed in order to identify that the service has been released under Brazilian MO certification, for example: in the work order and/or airframe logbook, the following text may be used:

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

Note –The process of return to service must be in accordance with the provisions of RBAC 43 as applicable to the work performed as well as must be in compliance with any special requirements of the operator.

C.3.5.11 Maintenance record keeping

- a) This part of the Supplement should specify procedures on how the foreign MO will keep a copy of each Work with all attached supplementary forms and Parts Certifications. The procedures should be clear to state time which maintenance records should be kept (check for section B.30 for discussion on the subject). These procedures should be included on supplement if record keeping is not adequately covered by MO manuals system but have been considered necessary to ensure compliance with RBAC 145 on this regards.
- b) Specific activities to be authorized to MO may require other time intervals for recordkeeping, for example, RCA which requires the record keeping for 7 years (refer to IS 21.181-001, Portuguese only).

C.3.5.12 Annual maintenance inspection (Inspeção Anual de Manutenção - IAM)

- a) This part of the Supplement should comprise MO procedures regarding processing of IAM - 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;

Note: Reviewing logbook information of Brazilian registered articles implies on comprehension of the Portuguese language. Such comprehension is required by RBAC 145.151, as discussed on section B.13 of this IS.

- II - Procedures regarding approval of IAM. If IAM has been successfully done and aircraft has been considered to be airworthy, the MO should fill DIAM (“Declaração de Inspeção Anual de Manutenção”) (<http://www2.anac.gov.br/certificacao/Form/Form.asp>) form and send it to ANAC. In addition, the following forms must be filled out in the event of IAM approval: 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”. These forms may be found on the site: <http://www2.anac.gov.br/certificacao/Form/Form.asp>:

Note: Approval of the IAM implies that all applicable airworthiness directives for the aircraft, engine(s), propeller(s) and appliances (AD applicability for Brazilian registered articles has been discussed on subsection B.24), have been complied with.

- III - Procedures regarding disapproval of IAM. In case the aircraft cannot be returned to service due to a non-airworthy 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.

C.3.5.13 Procedures for revalidation of Aircraft Airworthiness Certificate

- a) This section of the supplement should contain MO procedures to revalidate the Airworthiness Certificate of the aircraft registered in Brazil.

Note 1 – The development of these procedures is applicable only for MO that intends to be certified in the airframe rating and intends to renew the CA validity of an aircraft registered in Brazil. Do not apply to MO certified in other ratings or do not intend to perform revalidation of CA.

Note 2 – The CA validity of Brazilian civil aircraft is regulated by RBAC 21, section 21.181 which time intervals are described in item 5.2 of IS 21.181-001 (both documents available only in Portuguese).

- b) Procedures for CA revalidation should establish:
- I- How the OM will conduct a survey of the information needed to complete the F-100-33 form (Airworthiness Condition Report - RCA and Checklist), which is available at the website: <http://www2.anac.gov.br/certificacao/Form/Form.asp>. The survey of such

information should involve the verification of airframe, engine, propeller logbook, as well as control of directives, major changes/repairs carried out on the aircraft, and compliance to maintenance program recommended by the manufacturer and possible requirements present in EA (Brazilian TCDS) of the aircraft.

- II- Procedure for conducting the physical inspection of the aircraft in order to enable evaluation and completion of the subjects in the Checklist (found in F-100-33 form).
- III- Procedure for sending the F-100-33 form to ANAC in case of the aircraft have been deemed airworthy

Note – According to item 5.4.8 of IS 21 181, a F-100-33 form copy issued shall remain recorded in MO file for at least 07 year

C.3.5.14 Reporting of service difficulties

- a) This part of the Supplement should describe procedures to ensure that all service difficulties identified, during the performance of maintenance on Brazilian products, are reported in accordance to RBAC 145.221 (refer to section B.31 for discussion on subject).
- b) The procedures should cover:
 - I - How MO will perform the submission of data regarding defects or malfunction detected. As discussed on section B.31, IS 00-001 (Portuguese only) brings important references on the subject.
 - II - Other procedures and relevant information that are not adequately covered by MO manuals system but have been considered necessary to ensure compliance with RBAC 145 concerning reporting of service difficulties.
- c) Also, as an acceptable mean to submit service difficulties report, the MO could forward a copy of the report as already established on its manual system to comply with local CAA requirements regarding same subject (using, for example, FAA form 8010-4).

C.3.5.15 Periodic reports

- a) This part of the Supplement should describe procedures that foreign MO will use to ensure periodic reporting of work performed in Brazilian products and technical staff involved as required by RBAC 145.221-I (refer to section B.32 for discussion on this subject).
- b) Procedures for reports regarding work performed on Brazilian products should include as applicable, the name of the Brazilian customer, product identification, model, registration marks or serial number and the scope of the work performed.
- c) Procedures for reports regarding the list of people authorized to engage on works performed on Brazilian articles.

C.3.6 Organization and procedures for MO training

These parts of the supplement should bring the MO'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) Personnel responsible to release to service;
- c) Human Factors Training Program; and
- d) Dangerous Goods

C.3.6.1 Manual procedures and regulations training

- a) In order to maintain compliance with Brazilian Regulations, initial, recurrent and remedy 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 approve return to service 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 for 5 years, at least (see section B.30 for discussion on subject).

C.3.6.2 Personnel responsible to release to service

- a) 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).
- b) In addition, the training should be attended before these people realize the approval for return to service of any Brazilian aeronautical product.

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 is involved with dangerous goods manipulation, including the declaration to ANAC prior certificate emission.

C.3.7 Safety Management System – SMS (SGSO)

Section RBAC 145.214-I sets requirements for the foreign MO and its accountable manager with respect to the Sistema de Gerenciamento da Segurança Operacional – SGSO (implementation of ICAO's recommended Safety Managing System –SMS). Structure of SGSO on MO are described on IS 145.214-001 should be reviewed to assess how the or-

ganization will accomplish this system and how it would affect its own manual system and Brazilian supplement. Section B.27 brings more discussion on the subject.

C.3.8 ANAC forms

As required by RBAC 145 211(c)(3), the MO should establish in its system manual templates for all inspection and maintenance forms and the instructions for filling it out. This supplement section may be used to display those relevant forms to work on Brazilian articles, which are not present in manuals that meet local CAA requirements.

APPENDIX D - APPLICABLE RBAC 120 REQUIREMENTS FOR FOREIGN MO

- D.1 RBAC 120 APPLICABILITY TO FOREIGN MO
- D.1.1 Maintenance organizations certified by ANAC in accordance with the RBAC 145 should develop a Prevention Program Associate with the misuse of psychoactive substances in Civil Aviation - PPSP, as required by RBAC 120 section 120.3.
- D.1.2 Within an OM, RBAC 120 is applicable to any person pursuing Risk Activities for Operational Safety in Civil Aviation - ARSO. The maintenance, preventive maintenance, inspection or modification of aeronautical products are considered ARSO activities.
- D.1.3 The paragraph 120.347(a) of RBAC 120 provides that no steps to collect material for a Drug Testing of Psychoactive Substance - ETSP should be conducted outside the national territory. Thus, the applicability of this Regulation to localized maintenance organizations outside Brazil have reduced scope, restricted to the subpart H of the Regulation on the development of a sub-program of Education for Associated Risk Prevention of Misuse of Substances psychoactive, with some limitations.
- D.1.4 Considering restrictions of the applicability for MO certified outside Brazil, below is displayed the minimum content that must be incorporated into the PPSP and complementary orientations.
- D.1.5 Compliance with the requirements of this regulation can be made from the local regulatory compliance requirements for preventing the use of psychoactive substances.
- D.2 SUBPROGRAM CONTENT FOR EDUCATION IN PREVENTING OF RISK ASSOCIATED WITH IMPROPER USE OF PSYCHOACTIVE SUBSTANCES
- D.2.1 The educational material for MO (certified by ANAC abroad) employees performing ARSO include:
- a) The ARSO ratings covered by the program;
 - b) Information relating to substances, including medications accompanied or not by a doctor prescription, for restricted use of ARSO employees.
 - c) policy on the use of psychoactive substance in the workplace;
 - d) the names of persons nominated to answer questions about the program;
 - e) general Information about:
 - I - effects of substance use on health, work and personal life of the individual;
 - II - signs and symptoms of abuse and dependence of psychoactive substances; and
 - III - methods of treatment available in the community to solve problems associated with the use of psychoactive substances.
- D.2.2 Contracted companies by MO certified, may, according to the contracting criteria, be included in the contractor's PPSP. If the OM chooses not to include in its program, the MO

shall to require that the contracted company have its own PPSP under this Regulation and equally valid by ANAC. Under risk assessment to be made by responsible company, in emergency situations, it may hire a company or individual for the execution of an ARSO not covered by a PPSP.

- D.2.3 Each OM should provide a compliance checklist, accompanied by a complete listing of all sections and requirements of RBAC 120 with corresponding compliance method to be adopted, which must be submitted to ANAC before the implementation of proposed PPSP. The MO certified by ANAC abroad should indicate the non-applicable items citing the section 120.347 of the RBAC 120.
- D.2.4 The OM should develop , design and implement internally or contract, an education sub-pro, contemplating the following points:
- I - Provide, the ARSO employees and their supervisors, information about the misuse of psychoactive substances;
 - II - distribution and display of information material, according to the section 120.305 of the RBAC 120;
 - III - Training of ARSO employees in the education program before performing ARSO;
 - IV - Providing updated education program to ARSO employees at least every 5 (five) years;
 - V - Except as provided in paragraph (i) of RBAC 120, section 120.321, the development, the elaboration of the content and implementation of the education sub-program must be coordinated by the specialist - ESP or by professional with equivalent training, designated by the company.

Note – RBAC 120, section 120.321 establishes that for MO that do not approve aircraft (operated in accordance with part 121) for return to service, the preparation of the content and implementation of the education sub-program does not need to be coordinated by ESP or professional with equivalent training, since the issues contemplated by paragraph 120.323(a)(12) of the RBAC 120 are treated by ANAC guidelines publicly disclosed.