

OTARs 21, 43 & 145 - LOG OF COMMENTS RECEIVED DURING THE CONSULTATION PERIODS 7 JANUARY 2026 TO 7 APRIL 2026

OTAA Reference	Date	Commenter	Comment Summary	Discussion/Decision	Status
<p>BCAA Email dated 7 January 2026</p> <p>OTAC 145-10 Para 4.</p>	<p>07/01/2026</p>	<p>BCAA Mike Swann</p>	<p>Just wanting to check something which looks like a typo, identified by a customer.</p> <p>Should the highlighted section of OTAC 145-10 Issue 2 Para 4 say: ...”does not hold” rather than ..‘does hold’..?</p> <p>OTAC 145-10 Para 4 Approval options: OTAR Part 145 has two approval options: Option One - based on an existing capability defined by one of the following approvals: EASA Part 145, UK CAA 145, FAA FAR 145 or Transport Canada CAR Part V Subpart 73. Option Two – in the event that an organisation does hold an existing capability under Option One above, approval will be via a direct approval granted by the OTAA after undertaking a full assessment against the requirements of OTAR Part 145 Subpart D.</p>	<p>ASSI, Peter Davidson. Agreed, looks like a typo from when it was first issued in 2011.</p> <p>The OTAC is due for review this year so I will correct it as part of that review. I also note that some of the other sections are a bit dated now, application processes are very OTAA specific and the world of SMS compliance under FAA and TCCA approvals may need some newer guidance. Also, the MOE and supplement templates may not be up to date with the current changes to Part 145 being processed, in particular, scope of approval for Option 1 variations and components etc, so if you have any views on their current suitability and the case for a new “Anybodies MOE” template, let me know.</p>	<p>OTAR Part 145: Aircraft Maintenance Organisation Approval. This is a second shorter consultation on OTAR Part 145. Details of the amendments being proposed can be found on the ASSI website’s Consulting You/OTARs for consultation page. Comments should be received by 10 March 2026 and can be sent by email to assi.consultation@airsafety.aero</p> <p>Propose review and propose amendment to OTAC 145-10 Para 4 as requested, after consultation period for Part 145 finalised and closed. Review in conjunction with MOE templates as noted.</p>

<p>BAS Email dated 7 January 2026</p> <p>OTAR Part 145 Draft Version 10.13</p>	<p>15/01/2026</p>	<p>BAS Mark Thomas</p>	<p>Item: - OTAR 145.59 (f) 'An organisation may fabricate a restricted range of component parts to be used in the course of undergoing work within its own facilities in a manner acceptable to the Governor. Examples of fabrication under the scope of an OTAR 145 approval include but are not limited to the following: (i) fabrication of bushes, sleeves and shims, (ii) fabrication of secondary structural elements and skin panels, (iii) fabrication of control cables, (iv) fabrication of flexible and rigid pipes, (v) fabrication of electrical cable looms and assemblies, formed or machined sheet metal panels for repairs.'</p> <p>Comment to ASSI:- My feedback is this seems a rather open statement, especially in the context of a North American 145. My view is this would be better served by adding wordage that requires the scope of the parts manufactured to be defined within the organisations 145 processes, stating that the part needs to be made in conformity to approved data and accompanied by an ARC OTAR Form 71 or equivalent, and identified, by part number, as being a part made by that organisation (such as with PMA parts). ASSI may consider that OTAR 21 and OTAR 43 cover these elements already or the manner acceptable to the Governor statement, but if considered the case, I would suggest considering cross referencing this to compliance with those OTAR's. My concern is that as worded, an organisation may take</p>	<p>ASSI Peter Davidson.</p> <p>1. Feedback that this seems a rather open statement, especially in the context of a North American 145:</p> <p>The wording was transferred directly from OTAR 21 Subpart K to OTAR 145.59; therefore, nothing has changed with the actual fabrication policy which has been around for some time in OTAR 21 Subpart K. I agree that this maybe a bit of an open statement, but it is basically the same policy and wording that other major NAAs use and is based on compliance guidance material from EASA and the FAA. At this round of amendments to OTAR 21, it was transferred to OTAR 145 since other feedback suggested that this would be a more appropriate place for it, as a reference for Part 145 Organisations, who are performing maintenance that includes the fabrication of parts. In the context of North American Repair Organisations, the FAA and Transport Canada have similar requirements so it should not detract from their normal base procedures as Option 1 Organisations.</p> <p>2. Feedback suggesting adding wordage that requires the scope of the parts manufactured to be defined within the organisations 145 processes, stating that the part needs to be made in conformity to approved data and accompanied by an ARC OTAR Form 71 or equivalent, and identified, by part number, as being a part made by that organisation (such as with PMA parts).</p> <p>The general permission to fabricate a restricted range of parts is an intentional part of the Part 145 approval process, so as not to restrict Maintenance Organisations in following their normal overhaul practices, as per other international protocols, safe-guarded by the requirement to always have appropriate approved or accepted data for release to service</p>	<p>1. There is further OTAC guidance on the fabrication of repair parts during maintenance, available in OTAC 145-12 Para 6. This guidance will be reviewed and expanded, if necessary, at the next routine review of the OTAC.</p> <p>2. Not agreed to add wordage to include MOE scope of work requirements for fabrication, in Part 145 at this change. Propose to review again in the next cycle of Airworthiness OTAR reviews.</p>
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<p>BCAA Email dated 7 January 2026</p> <p>OTAC 145-10 Para 4.</p>	<p>19/01/2026</p>	<p>BCAA</p>	<p>Customer query, re OTAC 21-5 language, see here below;</p> <p>We have a question regarding the following sentence: - “A maintenance history record to include flight hours/cycles/landings as applicable should be available for all used serialised and life limited parts including details of scheduled maintenance requirements derived from the donor aircraft maintenance programme and maintenance planning schedule”</p> <p>By serialised and life limited parts, does it mean that even for OCCM parts that are serialized we need to have full Flight hour/cycles record for the part, or only in case of serialised life limited parts? The confusion here is because it is an “and” and not an “or”.</p>	<p>ASSI Peter Davidson. In my view, the sentence works in that some life limited parts maybe do not have serial numbers, so while we have a mixture nowadays, of life-limited, hard time and on condition parts, the onus is still on the certifier and subsequent installer to ensure that the maintenance records are correct as per OTAR 43.57 and 43.105. Maybe this could be improved as follows:</p> <p>(h) A maintenance history record should be available for all used serialised aircraft components and other significant aircraft components, to ensure traceability to such installed aircraft component documentation, associated maintenance data and data for modifications and repairs, including details of scheduled maintenance requirements derived from the donor aircraft maintenance programme and maintenance planning schedule.</p> <p>EASA GM M.A.305(d)(2) Aircraft continuing airworthiness record system. TASKS CONTROLLED AT COMPONENT LEVEL. (d) The following table provides a summary of the records’ requirements related to components subjected to primary maintenance process, including components without an EASA Form 1 in accordance with 21.A.307 (c).</p>	<p>OTAR Part 145 and Part 21 on a second shorter consultation for changes. Details of the amendments being proposed can be found on the ASSI website’s Consulting You/OTARs for consultation page. Comments should be received by 10 March 2026 and can be sent by email to assi.consultation@airsafety.aero</p> <p>Propose review and amendment to OTAC 145-10 Para 4.2 to include information on record requirements for on condition components as per EASA AMC and GM material. To be done after consultation periods for Parts 21, 39, 43 & 145 finalised and closed.</p> <p>Email reply 21/01/2026. Thank you for taking a look into this query for us. I believe the focus of the customer query was on whether parts which are classified as On-Condition should need to have a full hours/cycles history and I think the EASA table tries to answer that, so I’ll advise them to apply the logic of that table to the determination of which records are required.</p>
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