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Recency requirements for Part 66(L) License Holders working on gliders

Part 66(L) Licensed Engineers issuing Certificates of Release to Service (CRS) for gliders are subject to the recency requirements defined in Part 66. Under Rule **66.A.20(b)2**, the definition is 6 months work in the preceding 2 years. This is clarified in the Acceptable Means of Compliance **AMC 66.A.20(b)(2)** as 100 days for Engineers working for a Maintenance Organisation and 50 days for Independent Certifying Staff. These requirements are very difficult, or impossible, to meet for many glider Engineers, who work on a part-time, voluntary basis, often at weekends only, in summer, or when gliders are in winter storage.

EGU has been working with EASA, alongside EBF (the European Ballooning Federation) and EAS (Europe Air Sports) to find other routes to support legal recency of glider (and ballooning) Engineers.

When a licence is initially issued, the holder can rely on the practical experience acquired during their training for legal recency, instead of the 6 months requirement, during the first 2 years of holding the licence. This is stated in the Guidance Material **GM 66.A.20(b)2**.

EASA has committed to changing the requirements (via rulemaking in the coming 1-2 years) to enable recency to be supported at all times by practical experience equivalent to that required for the issue of the glider License holder rating. This would then be an alternative route for legal recency for Engineers who do not meet the (rolling) requirement of 100 days work in the previous 2 years. Using the new interpretation, only practical work is considered: there is no requirement for any repeat of theoretical study or examinations.

Under the new interpretation, Engineers will need to demonstrate, by logbook or other work record evidence, that a “representative cross section of maintenance tasks” have been undertaken in the preceding 2 years.

EASA, EGU, EBF and EAS are working on agreed examples of “representative sets of maintenance tasks”. There is a list of tasks for glider Engineers given in **Appendix II to AMC to Annex III section (1)C** of Part 66. Some of these tasks are never, or very rarely done as a working Engineer, even though they may be covered during training. The Part 66 list should be considered a list of possible tasks, from which any License holder can take those which are relevant and representative of their own specific work as a glider Engineer.

A “representative set of maintenance tasks” will vary from one license holder to another. For example, if a license holder primarily works on annual inspection and on rectification of defects arising from annual inspections, then their recency could be based on doing a reasonable number of such inspections and follow-up maintenance actions. EGU believes that the Part 66 task list specification for annual inspections (including follow-up maintenance) would be the bare minimum (per 2 years). This is defined as 8 inspections across at least 3 types (manufacturers) of gliders. For most license holders, it would be expected that this bare minimum would be supplemented by other maintenance work and/or more annual inspections.

EGU will provide updates as the work to define “representative set of maintenance tasks” continues.

For license holders working through a maintenance/airworthiness organisation (usually a CAO), the CAO approves the work a license holder may undertake, considering factors such as task-specific recency as well as competence. In the case of Independent Certifying Staff, they are accountable directly to their NAA for their recency monitoring.

EASA has updated its Frequently Asked Question **FAQ 19023** on Part 66 License holder recency, "*Is there a requirement to have 6 months' experience every 2 years to maintain the validity of the Part-66 licence? | EASA*". This FAQ covers all such license holders, so is somewhat complex. The full text is here: <https://www.easa.europa.eu/en/faq/19023>.

The key points for glider Engineers are summarized (by EGU) as follows below. Please note the clear commitment from EASA in the final sentence to update Part 66 in the near future.

EXTRACT from EASA FAQ 19023 as relevant for Part 66L License Holders working on gliders

As a holder of an aircraft maintenance licence, to exercise your certification privilege in accordance with 66.A.20(b)(2), please ensure:

- You have accumulated 6 months of experience in the previous 2 years;

Note: see also AMC 66.A.20(b)(2) for possible reductions of experience, in particular for independent certifying staff. Demonstration of experience should be made on the particular or similar aircraft. Guidance on 'similar' aircraft is also provided in AMC 66.A.20(b)(2).

or

- You can demonstrate that in the last 2 years, you have met the provisions for the issue of appropriate privileges, which means (refer to 66.A.45), as applicable to the case:

- for L-category licences (other than L5),
being able to demonstrate, in the last 2 years, practical experience, which shall include a representative cross section of maintenance activities relevant to the licence subcategory (B2/B2L, L1, L1C, L2, etc.)

Note: "A representative cross section of maintenance activities" means representative cross-section of the tasks listed in Appendix II to AMC to Annex III (Part-66) "Aircraft Type Practical Experience and On-the-Job Training - List of Tasks". "Demonstrate" means having a record thereof, such as a logbook.

Note: GM 66.A.20(b)2 will be reviewed and amended according to this interpretation through rulemaking task RMT.0735.

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