

Swiss Confederation

Federal Department of the Environment, Transport, **Energy and Communications DETEC**

Federal Office of Civil Aviation FOCA

Safety Division - Aircraft **Technical Organisations Zurich**

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by e-mail

To all Swiss Part 145 AMO's holding TCCA Approval

File: BAZL-053.23-3/7/2/3 Your reference: TCCA SIS 2025 Zürich-Flughafen, 7 August 2025

Lessons learned, TCCA SIS in Switzerland 2025

Dear Sir or Madam

In June 2025 the TCCA (Transport Canada Civil Aviation Authorities) have conducted a SIS inspection in Switzerland. The target of a SIS inspection is to verify compliance of the FOCA and the inspected AMO's (approved maintenance organisations) with the TCCA/EASA MAG and TCCA special condi-

With this we would like to inform you of the outcome of the SIS and to allow you to review the various topics, in order to take action as necessary to correct any discrepancies found.

The FOCA, during audits and TCCA supplement assessments, will focus in more depth on the items identified. If not corrected, findings and or observation will be raised.

Following the findings and observations, as well the FOCA recommendations and guidance:

Finding 1:

The supplements reviewed for "Y" and "Z" were mostly copied directly from the MAG template in Appendix 1 and did not reflect the actual organizations procedures with regards to the TCCA approval activity.

MAG reference:

Section C 1.2

Recommendation:

Review your TCCA supplement procedures in relation to the MAG Appendix 1. Procedures should have the 5 parts "Who", What", When", Where" and "How". For your guidance, following the FAA definition for procedures:

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FAA Procedures

Methods or practices that are written or unwritten, regulatory or non-regulatory, designed into a process that a certificate holder/applicant uses to accomplish a desired result.
Note: Unwritten methods refer to certificate holders/applicants that are not required by regulation to have documented procedures.
A method to monitor and measure the outputs and performance of a process, and to identify problems, or potential problems, in order to take corrective action.

Procedures = A five (5) part description of a Process Measure which includes;

1.	Who	Is immediately responsible	= person by title
2.	What	are they responsible for	= action (process)
3.	When	is the action to take place	= stage of maintenance process after & before)
4.	Where	is the description	= of the process (any <u>reference</u> document
	used?)		
5.	How	is the outcome documented	= Repair station or FAA form used

Finding 2:

The supplement held by FOCA was not the same version held by "Y" even though they were the same revision number.

MAG reference:

Section C III

Recommendation:

If a TCCA supplement is digitally signed by the FOCA, it must be kept in such a way that the certificate of the digital signature remains valid. Otherwise, without valid certificate of the digital signature, the supplement has to be regarded as potentially changed, not the same version as the one from FOCA.

Finding 3:

Dual maintenance release was not present in the logbook for both work orders that were reviewed.

MAG reference:

Section C Appendix 1, point 10

Recommendation:

Follow strictly the guidance given per MAG Appendix 1, including the given maintenance release statement (dual release).

Observation 1:

The third-party QA auditor was not trained per company procedure.

Reference:

CAR573.06(1)

Recommendation:

Provide company procedure training to all of your staff including contractors and keep evidence of such training. Company training includes training of your TCCA supplement.

Observation 2:

The audit checklist for the TCCA Supplement includes TCCA CAR references, many of which are incorrect.

Reference:

CAR573.09(3)(c)

Recommendation:

Keep your manual and references up to date.

Observation 3:

The audit checklist does not cover all aspects of the TCCA Supplement.

Reference:

CAR573.09(3)(c)

Recommendation:

Review your internal audit check list for completeness, to cover all aspects related to your TCCA approval, such as the special conditions, all TCCA supplement chapters, all locations and relevant business units etc. Keep your evidence of internal audits sufficiently detailed and accurate.

Observation 4:

The training file for Mr xyz did not contain any TCCA Supplement training.

Reference:

CAR573.06(3)

Recommendation:

See recommendation of observation 1.

Observation 5:

The audit checklist did not confirm that the TCCA Supplement meets the intended requirements, and it did not capture the dual maintenance releases absent from the logbook.

Reference:

CAR573.09(3)(c)

Recommendation:

See recommendation of observation 3.

Shared experience, feedback from EASA of other TCCA SIS inspections:

The TCCA supplement being part of the MOE, the indirect approval process (EASA accepted process but not recognized by TCCA and not applicable to any TCCA special conditions and MOE supplement) has been used for approval of changes affecting the TCCA supplement without going through the normal approval process.

This <u>indirect approval process is not recognized by TCCA</u> and not applicable to any TCCA supplement (and associated procedure).

Ensure that:

- any indirect approval process procedure will clearly exclude the TCCA supplement (or all other supplements)
- When used this indirect approval does not cover procedures referenced by the TCCA supplement, including does in the MOE.

The TCCA supplement being part of the MOE some consider that the MOE approval covers the TCCA supplement.

1/ In case of change only on the supplement the AMO must generate an MOE revision.

2/ the MAG ask clearly for the supplement to be approved.

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3/ if only MOE approval exists, demonstration of the supplement approval is impossible to demonstrate based on the detail of each revision.

<u>Finding have been raised</u> regarding MOE change impacting TCCA supplement, without update of the accountable manager signature on the TCCA supplement.

The MOE is there to demonstrate compliance to EASA requirement.

The TCCA supplement is there to demonstrate compliance to TCCA special conditions (SC). It addresses another approval and compliance to another regulatory system. Therefore, it's approval must be clear.

We thank you for your cooperation and stay at your disposal for any subject related question you may have.

Kind regards

Federal Office of Civil Aviation

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