

AMC/GM to Part-CAMO

Draft December 2019

TABLE OF CONTENTS

Table of contents 2

GENERAL 5

GM1 to Annex Vc (Part-CAMO) Definitions 5

SECTION A ORGANISATION REQUIREMENTS 8

AMC1 CAMO.A.115 Application for an organisation certificate	8
AMC2 CAMO.A.115 Application for an organisation certificate	8
GM1 CAMO.A.115(b) Application for an organisation certificate.....	8
AMC1 CAMO.A.115(b)(2) Application for an organisation certificate	9
AMC1 CAMO.A.125(d)(3) Terms of approval and privileges.....	9
GM1 CAMO.A.125(e) Terms of approval and privileges	10
GM1 CAMO.A.125(f) Terms of approval and privileges	11
AMC1 CAMO.A.130 Changes to the organisation	11
AMC2 CAMO.A.130 Changes to the organisation	11
GM1 CAMO.A.130 Changes to the organisation	11
GM1 CAMO.A.130(a)(1) Changes to the organisation	12
GM2 CAMO.A.130(a)(1) Changes to the organisation	12
GM1 CAMO.A.130(b) Changes to the organisation	12
AMC1 CAMO.A.150 Findings	13
GM1 CAMO.A.150 Findings	13
AMC1 CAMO.A.160 Occurrence reporting	13
AMC2 CAMO.A.160 Occurrence reporting	14
GM1 CAMO.A.160 Occurrence reporting	14
GM1 CAMO.A.160(b) Occurrence reporting.....	14
GM1 CAMO.A.200 Management system	14
AMC1 CAMO.A.200(a)(1) Management system	17
GM1 CAMO.A.200(a)(1) Management system	17
GM2 CAMO.A.200(a)(1) Management system	18
AMC1 CAMO.A.200(a)(2) Management system	18
GM1 CAMO.A.200(a)(2) Management system	19
AMC1 CAMO.A.200(a)(3) Management system	19
GM1 CAMO.A.200(a)(3) Management system	21
GM2 CAMO.A.200(a)(3) Management system	22
AMC1 CAMO.A.200(a)(4) Management system	23
GM1 CAMO.A.200(a)(4) Management system	24
GM1 CAMO.A.200(a)(5) Management system	24
AMC1 CAMO.A.200(a)(6) Management system	25
AMC2 CAMO.A.200(a)(6) Management System	25
AMC3 CAMO.A.200(a)(6) Management system	26
AMC4 CAMO.A.200(a)(6) Management system	26
GM1 CAMO.A.200(a)(6) Management system	27
AMC1 CAMO.A.202 Internal safety reporting scheme	27
GM1 CAMO.A.202 Internal safety reporting scheme	28
GM1 CAMO.A.205 Contracting and subcontracting	28
AMC1 CAMO.A.215 Facilities Facilities	29
AMC1 CAMO.A.220 Record-keeping.....	29
AMC2 CAMO.A.220 Record-keeping.....	29
GM1 CAMO.A.220 Record-keeping.....	30
AMC1 CAMO.A.220(c)(1)(ii) Record-keeping	30
AMC1 CAMO.A.300 Continuing airworthiness management exposition (CAME).....	31
AMC2 CAMO.A.300 Continuing airworthiness management exposition (CAME).....	33
GM1 CAMO.A.300 Continuing airworthiness management exposition (CAME).....	33

AMC1 CAMO.A.300(a)(1) Continuing airworthiness management exposition (CAME)	34
AMC1 CAMO.A.305(a) Personnel requirements.....	35
AMC1 CAMO.A.305(a)(3) Personnel requirements	35
GM1 CAMO.A.305(a)(3) Personnel requirements	35
AMC1 CAMO.A.305(a)(4);(a)(5) Personnel requirements.....	35
GM1 CAMO.A.305(a)(5) Personnel requirements	37
AMC1 CAMO.A.305(b)(2) Personnel requirements	37
AMC1 CAMO.A.305(c) Personnel requirements	37
AMC1 CAMO.A.305(d) Personnel requirements.....	38
GM1 CAMO.A.305(f) Personnel requirements	39
AMC1 CAMO.A.305(g) Personnel requirements	39
AMC2 CAMO.A.305(g) Personnel requirements.....	40
AMC3 CAMO.A.305(g) Personnel requirements.....	41
AMC4 CAMO.A.305(g) Personnel requirements.....	42
AMC5 CAMO.A.305(g) Personnel requirements	42
GM1 CAMO.A.305(g) Personnel requirements.....	43
GM2 CAMO.A.305(g) Personnel requirements.....	43
GM3 CAMO.A.305(g) Personnel requirements.....	46
AMC1 CAMO.A.310(a) Airworthiness review staff qualifications	46
AMC1 CAMO.A.310(a)(3) Airworthiness review staff qualifications.....	47
AMC1 CAMO.A.310(c) Airworthiness review staff qualifications	48
AMC1 CAMO.A.310(d) Airworthiness review staff qualifications	48
GM1 CAMO.A.315 Continuing airworthiness management	48
GM1 CAMO.A.315(b)(1) Continuing airworthiness management	49
AMC1 CAMO.A.315(b)(3) Continuing airworthiness management	49
AMC1 CAMO.A.315(b)(4) Continuing airworthiness management	49
GM1 CAMO.A.315(b)(5) Continuing airworthiness management	49
AMC1 CAMO.A.315(c) Continuing airworthiness management	49
AMC2 CAMO.A.315(c) Continuing airworthiness management	50
GM1 CAMO.A.315(c) Continuing airworthiness management	51
GM1 CAMO.A.315(d) Continuing airworthiness management.....	51
AMC1 CAMO.A.325 Continuing airworthiness management data	51
GM1 CAMO.A.325 Continuing airworthiness management data	52
GM2 CAMO.A.325 Continuing airworthiness management data	52

SECTION B AUTHORITY REQUIREMENTS53

GM1 CAMO.B.120 Means of compliance	53
AMC1 CAMO.B.125(b) Information to the Agency	53
GM1 CAMO.B.125(b) Information to the Agency	53
GM2 CAMO.B.125(b) Information to the Agency	53
GM3 CAMO.B.125(b) Information to the Agency	54
AMC1 CAMO.B.200 Management system	54
GM1 CAMO.B.200 Management system	55
AMC1 CAMO.B.200(a)(1) Management system	56
GM1 CAMO.B.200(a)(2) Management system	56
AMC1 CAMO.B.200(a)(3) Management system	58
AMC2 CAMO.B.200(a)(3) Management system	59
AMC3 CAMO.B.200(a)(3) Management system	60
AMC1 CAMO.B.200(a)(5) Management system	61
GM1 CAMO.B.200(a)(5) Management system	62
AMC1 CAMO.B.200(d) Management system.....	62
GM1 CAMO.B.205 Allocation of tasks to qualified entities	63
AMC1 CAMO.B.220(a) Record-keeping	63
AMC1 CAMO.B.220(a)(1) Record-keeping	64
AMC1 CAMO.B.220(d) Record-keeping	64
AMC1 CAMO.B.300(a);(b);(c) Oversight principles	64
AMC1 CAMO.B.300(f) Oversight principles	65
AMC1 CAMO.B.305(a);(b) Oversight programme	65
AMC1 CAMO.B.305(b) Oversight programme	65
AMC2 CAMO.B.305(b) Oversight programme	66

AMC1 CAMO.B.305(b)(1) Oversight programme.....	66
AMC1 CAMO.B.305(c) Oversight programme.....	66
AMC2 CAMO.B.305(c) Oversight programme.....	67
AMC1 CAMO.B.305(d) Oversight programme	67
AMC1 CAMO.B.310 Initial certification procedure	68
AMC1 CAMO.B.310(a) Initial certification procedure	68
AMC1 CAMO.B.310(c) Initial certification procedure	69
AMC2 CAMO.B.310(c) Initial certification procedure	69
AMC1 CAMO.B.310(d) Initial certification procedure	69
GM1 CAMO.B.310(e)(1); CAMO.B.330 Initial certification procedure and changes.....	70
AMC1 CAMO.B.310(e)(2) Initial certification procedure	71
AMC1 CAMO.B.330 Changes	71
GM1 CAMO.B.330 Changes	72
AMC1 CAMO.B.355(c) Suspension, limitation and revocation	72

AMC AND GM TO APPENDICES TO PART-CAMO.....73

AMC1 to Appendix I to Part-CAMO — Continuing Airworthiness Management Organisation Certificate	73
--	----

APPENDICES TO AMC AND GM TO PART-CAMO.....74

Appendix I to AMC1 CAMO.A.115 — EASA Form 2.....	74
Appendix II to AMC1 CAMO.A.125(d)(3) — Subcontracting of continuing airworthiness management tasks.....	74
Appendix III to AMC4 CAMO.A.305(g) — Fuel Tank Safety training	80
Appendix IV to AMC1 CAMO.A.315(c) — Contracted maintenance	80
Appendix V to AMC2 CAMO.B.310(c) — EASA Form 13-CAMO.....	85

GENERAL

GM1 to Annex Vc (Part-CAMO) Definitions

For the purpose of the AMC & GM to Part-CAMO, the following definitions are used:

Audit	refers to a systematic, independent, and documented process for obtaining evidence, and evaluating it objectively to determine the extent to which requirements are complied with. <i>Note: audits may include inspections</i>
Alternative Means of Compliance (AltMoc)	are those means that propose an alternative to an existing AMC or those that propose new means to establish compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts for which no associated AMC have been adopted by the Agency.
Assessment	in the context of management system performance monitoring, continuous improvement and oversight, this refers to a planned and documented activity performed by competent personnel to evaluate and analyse the achieved level of performance and maturity in relation to the organisation's policy and objectives. <i>Note: an assessment focuses on desirable outcomes and the overall performance, looking at the organisation as a whole. The main objective of the assessment is to identify the strengths and weaknesses to drive continual improvement.</i> <i>Remark: for 'risk assessment', please refer to the definition below.</i>
Base maintenance	Ref. AMC1 145.A.10
Competency	is a combination of individual skills, practical and theoretical knowledge, attitude, training, and experience.
Correction	is the action to eliminate a detected non-compliance.
Corrective action	is the action to eliminate or mitigate the root cause(s) and prevent the recurrence of an existing detected non-compliance, or other undesirable conditions or situations. Proper determination of the root cause(s) is crucial for defining effective corrective actions to prevent reoccurrence.
Error	is an action or inaction by a person that may lead to deviations from accepted procedures or regulations. <i>Note: Errors are often associated with occasions where a planned sequence of mental or physical activities either fails to achieve its intended outcome, or is not appropriate with regard to the intended outcome, and when results cannot be attributed purely to chance.</i>
Hazard	is a condition or an object with the potential to cause or contribute to an aircraft incident or accident
Human factors	is anything that affects human performance, which means principles that apply to aeronautical activities, and which seek safe interface between the human and other system components by proper consideration of human performance.

Human performance	Refers to human capabilities and limitations which have an impact on the safety, and efficiency of aeronautical activities.
Inspection	<p>in the context of compliance monitoring and oversight, refers to an independent documented conformity evaluation by observation and judgement accompanied, as appropriate, by measurement, testing or gauging, in order to verify compliance with applicable requirements.</p> <p><i>Note: inspection may be part of an audit (e.g. product audit), but may also be conducted outside of the normal audit plan, for example to verify closure of a particular finding.</i></p>
Just Culture	Ref. Regulation (EU) No 376/2014, Article 2
Line maintenance	Ref. AMC 145.A.10
Near-miss	<p>is an event in which an occurrence to be mandatorily reported according to Regulation (EU) No 376/2014 was narrowly averted or avoided.</p> <p><i>Example: A CAMO staff on rechecking his/her work at the end of a task realises that an AD, AWL, CMR task was not properly processed (for instance in the AMP or continuing airworthiness record system) which would have led to a situation that the AD/AWL/CMR would not have been performed on time on the affected (fleet of) aircraft.</i></p>
Organisational factor	is a condition that affects the effectiveness of safety risk controls, related to the culture, policies, processes, resources, and workplace of an organisation.
Oversight planning cycle	refers to the time frame within which all areas of the approval and all processes should be reviewed by the competent authority by means of audits and inspections.
Oversight programme	refers to the detailed oversight schedule that defines the number of audits and inspections, the scope and duration of each audit and inspection, including details of product audits and locations, as appropriate, to be performed by the competent authority, and the tentative time frame for performing each audit and inspection.
Post holder	means the person nominated in accordance with point CAMO.A.305(b)(2).
Preventive action	is the action to eliminate the cause of a potential non-compliance, or other undesirable potential situation.
Risk assessment	is an evaluation based on engineering and operational judgement and/or analysis methods in order to establish whether the achieved or perceived risk is acceptable or tolerable.
Safety Culture	is an enduring set of values, norms, attitudes, and practices within an organisation concerned with minimising the exposure of the workforce and the general public to dangerous or hazardous conditions. In a positive safety culture, a shared concern for, commitment to, and accountability for safety is promoted.
Safety risk	refers to the predicted probability and severity of the consequences or outcomes of a hazard.

Safety training	refers to dedicated training to support safety management policies and processes, including human factors training. <i>Note: The main purpose of the safety training programme is to ensure that personnel at all levels of the organisation maintain their competency to fulfil their roles safely. Safety training should, in particular, consider the safety knowledge derived from hazard identification and risk management processes, and support the fostering of a positive safety culture.</i> <i>Note: Safety management training refers to specific training for the staff involved in safety management functions in accordance with point CAMO.A.305(a)(5) or CAMO.A.200(a)(3)</i>
Working days	Refer to days between and including Monday to Friday not including public holidays.

SECTION A ORGANISATION REQUIREMENTS

AMC1 CAMO.A.115 Application for an organisation certificate

An application should be made on an EASA Form 2 (Appendix I to AMC1 CAMO.A.115) or an equivalent form that is acceptable to the competent authority.

The EASA Form 2 is also valid for the application for other types of organisations pursuant to Regulation (EU) No 1321/2014. Organisations that apply for several certificates may do so using a single EASA Form 2.

AMC2 CAMO.A.115 Application for an organisation certificate

GENERAL

- (a) Draft documents should be submitted at the earliest opportunity so that assessment of the application can begin. The initial certification or approval of changes cannot take place until the competent authority has received the completed documents.
- (b) This information, including the results of the pre-audit specified in point CAMO.A.115(b)(1), will enable the competent authority to conduct its assessment in order to determine the volume of certification and oversight work that is necessary, and the locations where it will be carried out.
- (c) The intent of the internal pre-audit referred to in point CAMO.A.115(b)(1) is to ensure that the organisation has internally verified its compliance with the Regulation. This should allow the organisation to demonstrate to the competent authority the extent to which the applicable requirements are complied with, and to provide assurance that the organisation management system is established to a level that is sufficient to perform continuing airworthiness management activities.

GM1 CAMO.A.115(b) Application for an organisation certificate

PROCEDURE FOR CHANGES NOT REQUIRING PRIOR APPROVAL

The procedure for changes not requiring prior approval should include, as mentioned in point CAMO.A.300(a)(11)(iv), both the scope of those changes and how they will be managed and notified. For applicants for an initial certificate, the scope may be limited by the competent authority for the first period of operation. An extension of such a limited scope may be considered later; see GM1 145.A.85(c).

AMC1 CAMO.A.115(b)(2) Application for an organisation certificate**DOCUMENTATION FOR DEMONSTRATION OF COMPLIANCE**

- (a) Documentation to be provided to the competent authority in the frame of an application for an initial Part-CAMO certificate should include, as a minimum the continuing airworthiness management exposition (CAME), containing in particular:
 - for CAT, commercial specialised operations and commercial ATO/DTO operations, the description of the aircraft technical log system;
 - the technical content of the contract between the CAMO and the organisation subcontracted to carry out continuing airworthiness management tasks, when such arrangement exists.
- (b) Upon request by the competent authority, the CAMO should be able to demonstrate that arrangements are in place for all base and scheduled line maintenance for an appropriate period of time.

AMC1 CAMO.A.125(d)(3) Terms of approval and privileges**SUBCONTRACTING OF CONTINUING AIRWORTHINESS TASKS**

1. The CAMO may subcontract certain continuing airworthiness management tasks to qualified organisations. The subcontracted organisation performs the continuing airworthiness management tasks as an integral part of the CAMO's management system, irrespective of any other approval held by the subcontracted organisation (including CAMO or Part-145 approval).
2. The CAMO remains accountable for the satisfactory completion of the continuing airworthiness management tasks irrespective of any contract that may be established.
3. In order to fulfil this responsibility, the CAMO should be satisfied that the actions taken by the subcontracted organisation meet the standards required by Part-CAMO. Therefore, the CAMO management of such activities should be accomplished:
 - (a) by active control through direct involvement; and/or
 - (b) by endorsing the recommendations made by the subcontracted organisation.
4. In order to retain ultimate responsibility, the CAMO should limit subcontracted tasks to the activities specified below:
 - (a) airworthiness directive analysis and planning;
 - (b) service bulletin analysis;
 - (c) planning of maintenance;
 - (d) reliability monitoring, engine health monitoring;
 - (e) maintenance programme development and amendments;
 - (f) any other activities, which do not limit the CAMO responsibilities, as agreed by the competent authority.
5. The CAMO's controls associated with subcontracted continuing airworthiness management tasks should be reflected in the associated contract and be in accordance with the CAMO policy

and procedures defined in the CAME. When such tasks are subcontracted, the management system is considered to be extended to the subcontracted organisations.

6. With the exception of engines and auxiliary power units, contracts would normally be limited to one organisation per aircraft type for any combination of the activities described in Appendix II. Where contracts are made with more than one organisation, the CAMO should demonstrate that adequate coordination controls are in place and that the individuals' responsibilities are clearly defined in the related contracts.
7. Contracts should not authorise the subcontracted organisation to subcontract to other organisations elements of the continuing airworthiness management tasks.
8. The competent authority should exercise oversight of the subcontracted activities through the CAMO approval. The contracts should be acceptable to the competent authority. The CAMO should only subcontract to organisations which are specified by the competent authority on EASA Form 14.
9. The subcontracted organisation should agree to notify the CAMO of any changes affecting the contract as soon as practical. The CAMO should then inform its competent authority. Failure to do so may invalidate the competent authority's acceptance of the contract.
10. Appendix II to AMC1 CAMO.A.125(d)(3) provides information on the subcontracting of continuing airworthiness management tasks.

GM1 CAMO.A.125(e) Terms of approval and privileges

- (a) An organisation may be approved for the privileges of point CAMO.A.125(d) only, without the privilege to carry out airworthiness reviews. In this case, the airworthiness review can be contracted to another appropriately approved organisation. It is not mandatory that this contracted organisation is linked to an AOC holder, and it is possible to contract an appropriately approved independent CAMO which is approved for the same aircraft type.
- (b) In order to be approved for the privileges of point CAMO.A.125(e) for a particular aircraft type, it is necessary to be approved for the privileges of point CAMO.A.125(d) for that aircraft type.
- (c) Nevertheless, this does not necessarily mean that the organisation needs to be currently managing an aircraft type in order to be able to perform airworthiness reviews on that aircraft type. The organisation may be performing only airworthiness reviews on an aircraft type without having any customer under contract for that type.
- (d) Furthermore, this situation should not necessarily lead to the removal of the aircraft type from the organisation approval. As a matter of fact, since in most cases the airworthiness review staff are not involved in continuing airworthiness management activities, it cannot be argued that these airworthiness review staff are going to lose their skills just because the organisation is not managing a particular aircraft type. The important issue in relation to maintaining a particular aircraft type in the organisation approval is whether the organisation continuously fulfils all the Part-CAMO requirements (facilities, documentation, qualified personnel, management system, etc.) required for initial approval.

GM1 CAMO.A.125(f) Terms of approval and privileges

The sentence 'for the particular aircraft for which the organisation is approved to issue the airworthiness review certificate' contained in point CAMO.A.125(f) means that:

- For Part-M aircraft used by air carriers licensed in accordance with Regulation (EC) No 1008/2008, and for aircraft above 2 730 kg MTOM, the permit to fly can only be issued for aircraft which are in a controlled environment and are managed by that CAMO.
- For Part-M aircraft of 2 730 kg MTOM and below not used by air carriers licensed in accordance with Regulation (EC) No 1008/2008, and for Part-ML aircraft, the permit to fly can be issued for any aircraft.

AMC1 CAMO.A.130 Changes to the organisation

APPLICATION TIME FRAMES

- (a) The application for the amendment of an organisation certificate should be submitted at least 30 working days before the date of the intended changes.
- (b) In the case of a planned change of a nominated person, the organisation should inform the competent authority at least 20 working days before the date of the proposed change.
- (c) Unforeseen changes should be notified at the earliest opportunity, in order to enable the competent authority to determine whether there is continued compliance with the applicable requirements, and to amend, if necessary, the organisation certificate and related terms of approval.

AMC2 CAMO.A.130 Changes to the organisation

MANAGEMENT OF CHANGES

The organisation should manage the safety risks related to any changes to the organisation in accordance with AMC1 CAMO.A.200(a)(3) point (e). For changes requiring prior approval, it should conduct a risk assessment and provide it to the competent authority upon request.

GM1 CAMO.A.130 Changes to the organisation

CHANGES REQUIRING OR NOT REQUIRING PRIOR APPROVAL

The rule point CAMO.A.130 is structured as follows:

- Point (a) introduce an obligation of prior approval (by the competent authority) for specific cases listed under (1) to (4);
- Point (b) address all instances (including (a)) where the regulation explicitly requires an approval by the competent authority (e.g. CAME procedure for the completion of an airworthiness review under supervision, ref. CAMO.A.310(c)). Changes relevant to these instances should be considered as changes requiring a prior approval (see list in GM1 CAMO.A.130(b)), unless otherwise specified by the regulation.

Point (b) also indicates how all changes requiring prior approval should be handled;

- Point (c) introduce the possibility to agree with the competent authority that certain changes to the organisation (other than covered by (a) or (b)) can be implemented without prior approval depending on the compliance and safety performance of the organisation, and in particular, on its capability to apply change management principles.

GM1 CAMO.A.130(a)(1) Changes to the organisation

CHANGES THAT AFFECT THE SCOPE OF THE CERTIFICATE OR THE TERMS OF APPROVAL

Typical examples of such changes are listed below (not exhaustive):

- (1) the name of the organisation;
- (2) the organisation's principal place of business;
- (3) additional aircraft type/series/group;
- (4) the accountable manager referred to in point CAMO.A.305(a);
- (5) additional subcontracted organisation.

GM2 CAMO.A.130(a)(1) Changes to the organisation

CHANGE OF THE NAME OF THE ORGANISATION

A change of the name requires the organisation to submit a new application as a matter of urgency.

If this is the only change to report, the new application can be accompanied by a copy of the documentation that was previously submitted to the competent authority under the previous name, as a means of demonstrating how the organisation complies with the applicable requirements.

GM1 CAMO.A.130(b) Changes to the organisation

CHANGES REQUIRING PRIOR APPROVAL (OTHER THAN COVERED BY CAMO.A.130(a))

This GM is a non-exhaustive list of changes that require prior approval from the competent authority (other than covered by point CAMO.A.130(a)), as specified in the applicable Implementing Rules:

- (a) changes to the alternative means of compliance [CAMO.A.120(b)];
- (b) changes to the CAME procedure for the completion of an airworthiness review under supervision of the organisation's authorised ARS [CAMO.A.310(c)]
- (c) changes to the procedure to establish and control the competency of personnel [CAMO.A.305(g)]
- (d) changes to the system for reporting to the competent authority on the safety performance and regulatory compliance of the organisation (in the case of an extension beyond 36 months of the oversight planning cycle) [CAMO.B.305(d)]
- (e) changes to the procedure for the indirect approval of the maintenance programme of Part-M aircraft [M.A.302(c)]

AMC1 CAMO.A.150 Findings

GENERAL

The action plan defined by the organisation should address the effects of the non-compliance, as well as its root cause(s) and contributing factor(s).

Depending on the issues, the action plan should address correction/containment of the issue, corrective action and preventive action.

GM1 CAMO.A.150 Findings

CAUSAL ANALYSIS

- (a) It is important that the analysis does not primarily focus on establishing who or what caused the non-compliance, but on why it was caused. Establishing the root cause or causes of a non-compliance often requires an overarching view of the events and circumstances that led to it, to identify all the possible systemic and contributing factors (regulatory, human factors, organisational factors, technical, etc.) in addition to the direct factors.
- (b) A narrow focus on single events or failures, or the use of a simple, linear model, such as fault tree, to identify the chain of events that led to the non-compliance, may not properly reflect the complexity of the issue, and therefore there is a risk that important factors that must be addressed in order to prevent a reoccurrence will be ignored.
Such an inappropriate or partial causal analysis often leads to defining 'quick fixes' that only address the symptoms of the non-conformity. A peer review of the results of the causal analysis may increase its reliability and objectivity.
- (c) A system description of the organisation that considers the organisational structures, processes and their interfaces, procedures, staff, equipment, facilities and the environment in which the organisation operates, will support both effective causal (reactive) and hazard (proactive) analyses.

AMC1 CAMO.A.160 Occurrence reporting

GENERAL

- (a) Where the organisation holds one or more additional organisation certificates within the scope of Regulation (EU) 2018/1139 and its delegated and implementing acts:
 - (1) the organisation may establish an integrated occurrence reporting system covering all certificate(s) held; and
 - (2) single reports for occurrences should only be provided if the following conditions are met:
 - (i) the report includes all relevant information from the perspective of the different organisation certificates held;
 - (ii) the report addresses all relevant specific mandatory data fields and clearly identifies all certificate holders for which the report is made;
 - (iii) the competent authority for all certificates is the same and such single reporting was agreed with that competent authority.

- (b) The organisation should assign responsibility to one or more suitably qualified persons with clearly defined authority, for coordinating action on airworthiness occurrences and for initiating any necessary further investigation and follow-up activity.
- (c) If more than one person are assigned such responsibility, the organisation should identify a single person to act as the main focal point for ensuring a single reporting channel is established to the accountable manager. This should in particular apply to organisations holding one or more additional organisation certificates within the scope of Regulation (EU) 2018/1139 and its delegated and implementing acts where the occurrence reporting system is fully integrated with that required under the additional certificate(s) held.

AMC2 CAMO.A.160 Occurrence reporting

The organisation should share relevant safety related occurrence reports with the design approval holder of the aircraft in order to enable it to issue appropriate service instructions and recommendations to all owners or operators. Liaison with the design approval holder is recommended to establish whether published or proposed service information will resolve the problem or to obtain a solution to a particular problem.

GM1 CAMO.A.160 Occurrence reporting

MANDATORY REPORTING – GENERAL

- (a) For organisations having their principal place of business in a Member State, Regulation (EU) 2015/1018 lays down a list classifying occurrences in civil aviation to be mandatorily reported. This list should not be understood as being an exhaustive collection of all issues that may pose a significant risk to aviation safety and therefore reporting should not be limited to items listed in that Regulation.
- (b) AMC-20 'General Acceptable Means of Compliance for Airworthiness of Products, Parts and Appliances' provides further details on occurrence reporting (AMC 20-8).

GM1 CAMO.A.160(b) Occurrence reporting

DESIGN APPROVAL HOLDER

Depending on the case the 'organisation responsible for the design of the aircraft' will be the holder of a type-certificate, a restricted type-certificate, a supplemental type-certificate, a European Technical Standard Order (ETSO) authorisation, an approval for a repair or a change to the type design or any other relevant approval or authorisation for products, parts and appliances deemed to have been issued under Commission Regulation (EU) No 748/2012.

GM1 CAMO.A.200 Management system

GENERAL

Safety management seeks to proactively identify hazards and to mitigate the related safety risks before they result in aviation accidents and incidents. Safety management enables an organisation to manage its activities in a more systematic and focused manner. When an organisation has a clear

understanding of its role and contribution to aviation safety, it can prioritise safety risks and more effectively manage their resources and obtain optimal results.

The principles of the requirements in points CAMO.A.200, CAMO.A.202, CAMO.A.205 and the related AMC constitute the EU management system framework for aviation safety management. This framework addresses the core elements of the ICAO safety management system (SMS) framework defined in Appendix 2 to Annex 19, and it promotes an integrated approach to the management of an organisation. It facilitates the introduction of the additional safety management components, building upon the existing management system, rather than adding them as a separate framework.

This approach is intended to encourage organisations to embed safety management and risk-based decision-making into all their activities, instead of superimposing another system onto their existing management system and governance structure. In addition, if the organisation holds multiple organisation certificates within the scope of Regulation (EU) 2018/1139, it may choose to implement a single management system to cover all of its activities. An integrated management system may not only be used to capture multiple certification requirements, but also to cover other business management systems such as security, occupational health and environmental management systems. Integration will remove any duplication and exploit synergies by managing safety risks across multiple activities. Organisations may determine the best means to structure their management systems to suit their business and organisational needs.

The core part of the management system framework (CAMO.A.200) focuses on what is essential for safety management, by mandating the organisation to:

- (a) clearly define accountabilities and responsibilities;
- (b) establish a safety policy and the related safety objectives;
- (c) implement safety reporting procedures in line with just culture principles;
- (d) ensure the identification of aviation safety hazards entailed by its activities, ensure their evaluation, and the management of associated risks; including:
 - (1) taking actions to mitigate the risks;
 - (2) verifying the effectiveness of the actions taken to mitigate the risks;
- (e) monitor compliance, while considering any additional requirements that are applicable to the organisation;
- (f) keep their personnel trained, competent, and informed about significant safety issues; and
- (g) document all the key management system processes.

Compared to the previous Part-M Subpart G quality system 'framework', the new elements that are introduced with Part-CAMO are, in particular, those addressed under points (b) to (d). Points (c) and (d)(1) address component 2 'Safety Risk Management' of the ICAO SMS framework. Points (d)(2) and (e) address component 3 'Safety Assurance' thereof.

Point CAMO.A.200 defines the following as key safety management processes; these are further specified in the related AMC and GM:

- Hazard identification;
- Safety risk management;
- Internal investigation;
- Safety performance monitoring and measurement;

- Management of change;
- Continuous improvement;
- Immediate safety action and coordination with the aircraft operator's Emergency Response Plan (ERP).

It is important to recognise that safety management will be a continuous activity, as hazards, risks and the effectiveness of safety risk mitigations will change over time.

These key safety management processes are supported by a compliance monitoring function as an integral part of the management system for safety. Most aviation safety regulations constitute generic safety risk controls established by the 'regulator'. Therefore, ensuring effective compliance with the regulations during daily operations and independent monitoring of compliance are fundamental to any management system for safety. The compliance monitoring function may, in addition, support the follow-up of safety risk mitigation actions. Moreover, where non-compliances are identified through internal audits, the causes will be thoroughly assessed and analysed. Such an analysis in return supports the risk management process by providing insights into causal and contributing factors, including human factors, organisational factors and the environment in which the organisation operates. In this way, the outputs of compliance monitoring become some of the various inputs to the safety risk management functions. On the other hand, the safety risk management processes may be used to determine focus areas for compliance monitoring. In this way, internal audits will inform the organisation's management of the level of compliance within the organisation, whether safety risk mitigation actions have been implemented, and where corrective or preventive action is required. The combination of safety risk management and compliance monitoring should lead to an enhanced understanding of the end-to-end process and the process interfaces, exposing opportunities for increased efficiencies, which are not limited to safety aspects.

As aviation is a complex system with many organisations and individuals interacting together, the primary focus of the key safety management processes is on the organisational processes and procedures, but it also relies on the humans in the system. The organisation and the way in which it operates can have a significant impact on human performance. Therefore, safety management necessarily addresses how humans can contribute both positively and negatively to an organisation's safety outcomes, recognising that human behaviour is influenced by the organisational environment.

The effectiveness of safety management largely depends on the degree of commitment of the senior management to create a working environment that optimises human performance and encourages personnel to actively engage in and contribute to the organisation's management processes. Similarly, a positive safety culture relies on a high degree of trust and respect between the personnel and the management, and it must therefore be created and supported at the senior management level. If the management does not treat individuals who identify hazards and report adverse events in a consistently fair and just way, those individuals are unlikely to be willing to communicate safety issues or to work with the management to effectively address the safety risks. As with trust, a positive safety culture takes time and effort to establish, and it can be easily lost.

It is further recognised that the introduction of processes for hazard identification and risk assessment, mitigation and verification of the effectiveness of such mitigation actions will create immediate and direct costs, while related benefits are sometimes intangible and may take time to materialise. Over time, an effective management system will not only address the risks of major occurrences, but also identify and address production inefficiencies, improve communication, foster a better organisation culture, and lead to more effective control of contractors and suppliers. In addition, through an improved relationship with the authority, an effective management system may result in a reduced oversight burden.

Thus, by viewing safety management and the related organisational policies and key processes as items that are implemented not only to prevent incidents and accidents, but also to meet the organisation's strategic objectives, any investment in safety should be seen as an investment in productivity and organisational success.

AMC1 CAMO.A.200(a)(1) Management system

ORGANISATION AND ACCOUNTABILITIES

- (a) The management system should encompass safety by including a safety manager, and a safety review board in the organisational structure. The functions of the safety manager are those defined in AMC1 CAMO.A.305(a)(4);(a)(5).
- (b) Safety review board
 - (1) The safety review board should be a high-level committee that considers matters of strategic safety in support of the accountable manager's safety accountability.
 - (2) The board should be chaired by the accountable manager and composed of the person or group of persons nominated under point CAMO.A.300(a) and (b).
 - (3) The safety review board should monitor:
 - (i) safety performance against the safety policy and objectives;
 - (ii) that any safety action is taken in a timely manner; and
 - (iii) the effectiveness of the organisation's management system processes.
 - (4) The safety review board may also be tasked with:
 - (i) reviewing the results of compliance monitoring;
 - (ii) monitoring the implementation of related corrective and preventive actions.
- (c) The safety review board should ensure that appropriate resources are allocated to achieve the established safety objectives.
- (d) The safety manager or another person designated by the safety manager may attend, as appropriate, safety review board meetings. He or she may communicate to the accountable manager all information, as necessary, to allow decision-making based on safety data.
- (e) Notwithstanding point (a), where justified by the size of the organisation and the nature and complexity of its activities and subject to a risk assessment and agreement by the competent authority, the organisation may not need to establish a formal safety review board. In this case, the tasks normally allocated to the safety review board should be allocated to the safety manager.

GM1 CAMO.A.200(a)(1) Management system

SAFETY ACTION GROUP

- (a) Depending on the size of the organisation and the nature and complexity of its activities, a safety action group may be established as a standing group or as an ad hoc group to assist, or act on behalf of the safety manager or the safety review board.

- (b) More than one safety action group may be established, depending on the scope of the task and the specific expertise required.
- (c) The safety action group usually reports to, and takes strategic direction from, the safety review board, and may be composed of managers, supervisors and personnel from operational areas.
- (d) The safety action group may be tasked or assist with:
 - (1) monitoring safety performance;
 - (2) defining actions to control risks to an acceptable level;
 - (3) assessing the impact on safety of organisational changes;
 - (4) ensuring that safety actions are implemented within agreed timescales;
 - (5) reviewing the effectiveness of previous safety actions and safety promotion.

GM2 CAMO.A.200(a)(1) Management system

MEANING OF THE TERMS 'ACCOUNTABILITY' AND 'RESPONSIBILITY'

In the English language, the notion of accountability is different from the notion of responsibility. Whereas 'accountability' refers to an obligation which cannot be delegated, 'responsibility' refers to an obligation that can be delegated.

AMC1 CAMO.A.200(a)(2) Management system

SAFETY POLICY & OBJECTIVES

- (a) The safety policy should:
 - (1) reflect organisational commitments regarding safety, and its proactive and systematic management, including the promotion of a positive safety culture;
 - (2) include internal reporting principles, and encourage personnel to report continuing airworthiness-related errors, incidents and hazards;
 - (3) recognise the need for all personnel to cooperate with the compliance monitoring and internal investigations referred to under point (c) of AMC1 CAMO.A.200(a)(3);
 - (4) be endorsed by the accountable manager;
 - (5) be communicated, with visible endorsement, throughout the organisation; and
 - (6) be periodically reviewed to ensure it remains relevant and appropriate for the organisation.
- (b) The safety policy should include a commitment to:
 - (1) comply with all applicable legislation, to meet all the applicable requirements, and adopt practices to improve safety standard;
 - (2) provide the necessary resources for the implementation of the safety policy.
 - (3) apply human factors principles;
 - (4) enforce safety as a primary responsibility of all managers; and

- (5) apply 'just culture' principles to internal safety reporting and the investigation of occurrences and, in particular, not to make available or use the information on occurrences:
- (i) to attribute blame or liability to front line staff or other persons for actions, omissions or decisions taken by them that are commensurate with their experience and training; or
 - (ii) for any purpose other than the maintenance or improvement of aviation safety.
- (c) Senior management should continually promote the safety policy to all personnel, demonstrate its commitment to it, and provide necessary human and financial resources for its implementation;
- (d) Taking due account of its safety policy, the organisation should define safety objectives. The safety objectives should:
- (1) form the basis for safety performance monitoring and measurement;
 - (2) reflect the organisation's commitment to maintain or continuously improve the overall effectiveness of the management system;
 - (3) be communicated throughout the organisation; and
 - (4) be periodically reviewed to ensure they remain relevant and appropriate for the organisation.

GM1 CAMO.A.200(a)(2) Management system

SAFETY POLICY

- (a) The safety policy is the means whereby the organisation states its intention to maintain and, where practicable, improve safety levels in all its activities and to minimise its contribution to the risk of an aircraft accident or serious incident as far as is reasonably practicable. It reflects the management's commitment to safety, and should reflect the organisation's philosophy of safety management, as well as being the foundation on which the organisation's management system is built. It serves as a reminder of 'how we do business here'. The creation of a positive safety culture begins with the issuance of a clear, unequivocal policy.
- (b) The commitment to apply 'just culture' principles forms the basis for the organisation's internal rules describing how 'just culture' principles are guaranteed and implemented.
- (c) For organisations having their principal place of business in a Member State, Regulation (EU) No 376/2014 defines the 'just culture' principles to be applied (refer in particular to Article 16(11) of that Regulation).

AMC1 CAMO.A.200(a)(3) Management system

SAFETY MANAGEMENT KEY PROCESSES

- (a) Hazard identification processes
 - (1) A reporting scheme for both reactive event and proactive hazards should be the formal means of collecting, recording, analysing, acting on, and generating feedback about hazards and the associated risks that may affect safety.

- (2) The identification should include:
- (i) hazards that may be generated from human factor issues that affect human performance; and
 - (ii) hazards that may stem from the organisational set-up or the existence of complex operational and maintenance arrangements (such as when multiple organisations are contracted, or when multiple levels of contracting/subcontracting are included).
- (b) Risk management processes
- (1) A formal safety risk management process should be developed and maintained that ensures that there is:
 - (i) analysis (e.g. in terms of the probability and severity of the consequences of hazards and occurrences);
 - (ii) assessment (in terms of tolerability); and
 - (iii) control (in terms of mitigation) of risks to an acceptable level.
 - (2) The levels of management who have the authority to make decisions regarding the tolerability of safety risks, in accordance with (b)(1)(ii), should be specified.
- (c) Internal investigation
- (1) In line with its just culture policy, the organisation should define how to investigate incidents such as errors or near misses, in order to understand not only what happened, but also how it happened, to prevent or reduce the probability and/or consequence of future recurrences (refer to AMC1 CAMO.A.202).
 - (2) The scope of internal investigations should extend beyond the scope of the occurrences required to be reported to the competent authority in accordance with point CAMO.A.160, to include the reports referred to in CAMO.A.202(b).
- (d) Safety performance monitoring and measurement
- (1) Safety performance monitoring and measurement should be the process by which the safety performance of the organisation is verified in comparison with the safety policy and the safety objectives.
 - (2) This process may include, as appropriate to the size, nature and complexity of the organisation:
 - (i) safety reporting, addressing also the status of compliance with the applicable requirements;
 - (ii) safety reviews, including trends reviews, which would be conducted during the introduction of new products and their components, new equipment/technologies, the implementation of new or changed procedures, or in situations of organisational changes that may have an impact on safety;
 - (iii) safety audits focussing on the integrity of the organisation's management system, and on periodically assessing the status of safety risk controls; and
 - (iv) safety surveys, examining particular elements or procedures in a specific area, such as problem areas identified, or bottlenecks in daily continuing airworthiness management activities, perceptions and opinions of management personnel, and areas of dissent or confusion.

(e) Management of change

The organisation should manage the safety risks related to a change. The management of change should be a documented process to identify external and internal changes that may have an adverse effect on the safety of its continuing airworthiness management activities. It should make use of the organisation's existing hazard identification, risk assessment and mitigation processes.

(f) Continuous improvement

The organisation should continuously seek to improve its safety performance and the effectiveness of its management system. Continuous improvement may be achieved through:

- (1) audits carried out by external organisations;
- (2) assessments, including assessments of the effectiveness of the safety culture and management system, in particular to assess the effectiveness of the safety risk management processes;
- (3) staff surveys, including cultural surveys, that can provide useful feedback on how engaged personnel are with the management system;
- (4) monitoring the recurrence of incidents and occurrences;
- (5) evaluation of safety performance indicators and review of all the available safety performance information; and
- (6) the identification of lessons learnt.

(g) Immediate safety action and coordination with the operator's Emergency Response Plan (ERP)

- (1) Procedure should be implemented to enable the organisation to act promptly when it identified safety concerns with the potential to have immediate effect on flight safety, including clear instructions on who to contact at the owner/operator, and how to contact them, including outside of normal business hours. These provisions are without prejudice to the occurrence reporting required by point CAMO.A.160.
- (2) If applicable, procedure should be implemented to enable the organisation to react promptly if the ERP is triggered by the operator and it requires the support of the CAMO.

GM1 CAMO.A.200(a)(3) Management system

SAFETY RISK MANAGEMENT - INTERFACES BETWEEN ORGANISATIONS

- (a) Safety risk management processes should specifically address the planned implementation of, or participation of the organisation in, any complex operational and maintenance arrangements (such as when multiple organisations are contracted, or when multiple levels of contracting/subcontracting are included).
- (b) Hazard identification and risk assessment start with an identification of all the parties involved in the arrangement, including independent experts and non-approved organisations. This identification process extends to cover the overall control structure, and assesses in particular the following elements across all subcontract levels and all parties within such arrangements:
 - (1) coordination and interfaces between the different parties;
 - (2) applicable procedures;

- (3) communication between all the parties involved, including reporting and feedback channels;
 - (4) task allocation, responsibilities and authorities; and
 - (5) the qualifications and competency of key personnel with reference to point CAMO.A.305.
- (c) Safety risk management should focus on the following aspects:
- (1) clear assignment of accountability and allocation of responsibilities;
 - (2) that only one party is responsible for a specific aspect of the arrangement, with no overlapping or conflicting responsibilities, in order to eliminate coordination errors;
 - (3) the existence of clear reporting lines, both for occurrence reporting and progress reporting;
 - (4) the possibility for staff to directly notify the organisation of any hazard that suggests an obviously unacceptable safety risk as a result of the potential consequences of this hazard.
- (d) The safety risk management processes should ensure that there is regular communication between all the parties involved to discuss work progress, risk mitigation actions, and changes to the arrangement, as well as any other significant issues.

GM2 CAMO.A.200(a)(3) Management system

MANAGEMENT OF CHANGE

- (a) Unless they are properly managed, changes in organisational structure, facilities, the scope of work, personnel, documentation, policies and procedures, etc. can result in the inadvertent introduction of new hazards, and expose the organisation to new, or increased risk. Effective organisations seek to improve their processes, with conscious recognition that changes can expose the organisation to potentially latent hazards and risks if they are not properly and effectively managed.
- (b) Regardless of the magnitude of change, large or small, its safety implications should always be proactively considered. This is primarily the responsibility of the team that proposes and/or implements the change. However, a change can only be successfully implemented if all the personnel affected by the change are engaged, are involved and participate in the process. The magnitude of a change, its safety criticality, and its potential impact on human performance should be assessed in any change management process.
- (c) The process for the management of change typically provides principles and a structured framework for managing all aspects of the change. Disciplined application of the management of change can maximise the effectiveness of the change, engage the staff, and minimise the risks that are inherent in a change.
- (d) The introduction of a change is the trigger for the organisation to perform their hazard identification and risk management process.

Some examples of change include, but are not limited to:

- (1) changes to the organisational structure;
- (2) the inclusion of a new aircraft type in the terms of approval;
- (3) the addition of aircraft of the same or a similar type;

- (4) significant changes in personnel (affecting key personnel and/or large numbers of personnel, high turn-over);
 - (5) new or amended regulations;
 - (6) changes in the security arrangements;
 - (7) changes in the economic situation of an organisation (e.g. commercial or financial pressure);
 - (8) new schedule(s), location(s), equipment, and/or operational procedures; and
 - (9) the addition of new subcontractors.
- (e) A change may have the potential to introduce new, or to exacerbate pre-existing, human factor issues. For example, changes in computer systems, equipment, technology, personnel changes, including changes in management personnel, procedures, work organisation, or work processes are likely to affect performance.
- (f) The purpose of integrating human factor (HF) into the management of change is to minimise potential risks by specifically considering the impact of the change on the people within a system.
- (g) Special consideration, including any HF issues, should be given to the 'transition period'. In addition, the activities utilised to manage these issues should be integrated into the change management plan.
- (h) Effective management of change should be supported by the following:
- (1) Implementation of a process for formal hazard identification/risk assessment for major operational changes, major organisational changes, changes in key personnel, and changes that may affect the way continuing airworthiness management is carried out;
 - (2) Identification of changes that are likely to occur in business which would have a noticeable impact on:
 - (i) resources — material and human;
 - (ii) management direction — policies, processes, procedures, training; and
 - (iii) management control.
 - (3) Safety cases/risk assessments that are aviation-safety focused.
 - (4) Involvement of key stakeholders in the change management process as appropriate.
- (i) During the management of change process, previous risk assessments, and existing hazards are reviewed for possible effect.

AMC1 CAMO.A.200(a)(4) Management system

COMMUNICATION ON SAFETY

- (a) The organisation should establish communication about safety matters that:
- (1) ensures that all personnel are aware of the safety management activities, as appropriate, for their safety responsibilities;
 - (2) conveys safety-critical information, especially related to assessed risks and analysed hazards;

- (3) explains why particular actions are taken; and
 - (4) explains why safety procedures are introduced or changed.
- (b) Regular meetings with personnel at which information, actions, and procedures are discussed, may be used to communicate safety matters.

GM1 CAMO.A.200(a)(4) Management system

SAFETY PROMOTION

- (a) Safety training, combined with safety communication and information sharing forms part of safety promotion.
- (b) Safety promotion activities should support:
 - (1) the organisation's policies, encouraging a positive safety culture, creating an environment that is favourable to the achievement of the organisation's safety objectives;
 - (2) organisational learning; and
 - (3) the implementation of an effective safety reporting scheme and the development of a just culture.
- (c) Depending on the particular safety issue, safety promotion may also constitute or complement risk mitigation actions.
- (d) Qualification and training aspects are further specified in the AMC and GM to CAMO.A.305.

GM1 CAMO.A.200(a)(5) Management system

MANAGEMENT SYSTEM DOCUMENTATION

- (a) The organisation may document its safety policy, safety objectives and all its key management system processes in a separate manual (e.g. Safety Management Manual or Management System Manual) or in its CAME (cf. AMC1 CAMO.A.300, Part 2 'Management system procedures'). Organisations that hold multiple organisation certificates within the scope of Regulation (EU) 2018/1139 may prefer to use a separate manual in order to avoid duplication. That manual or the CAME, depending on the case, should be the key instrument for communicating the approach to the management system for the whole of the organisation.
- (b) The organisation may also choose to document some of the information that is required to be documented in separate documents (e.g. policy documents, procedures). In that case, it should ensure that the manual or the CAME contains adequate references to any document that is kept separately. Any such documents are to be considered as integral parts of the organisation's management system documentation.

AMC1 CAMO.A.200(a)(6) Management system

COMPLIANCE MONITORING — GENERAL

- (a) The primary objectives of compliance monitoring are to provide an independent monitoring function on how the organisation ensures compliance with the applicable requirements, policies and procedures, and to request action where non-compliances are identified.
- (b) The independence of the compliance monitoring should be established by always ensuring that audits and inspections are carried out by personnel who are not responsible for the functions, procedures or products that are audited or inspected.

AMC2 CAMO.A.200(a)(6) Management System

COMPLIANCE MONITORING — INDEPENDENT AUDIT

- (a) An essential element of compliance monitoring is the independent audit.
- (b) The independent audit should be an objective process of routine sample checks of all aspects of the CAMO ability to carry out continuing airworthiness management to the standards required by this Regulation. It should include some product sampling as this is the end result of the process.
- (c) The independent audit should provide an objective overview of the complete set of continuing airworthiness management-related activities.
- (d) The organisation should establish an audit plan to show when and how often the activities as required by Part-M, Part-ML and Part-CAMO will be audited.
- (e) The audit plan should ensure that all aspects of Part-CAMO compliance are verified every year, including all the subcontracted activities, and the auditing may be carried out as a complete single exercise or subdivided over the annual period. The independent audit should not require each procedure to be verified against each product line when it can be shown that the particular procedure is common to more than one product line and the procedure has been verified every year without resultant findings. Where findings have been identified, the particular procedure should be verified against other product lines until the findings have been closed, after which the independent audit procedure may revert back to a yearly interval for the particular procedure.
- (f) Provided that there are no safety-related findings, the audit planning cycle specified in this AMC may be increased by up to 100%, subject to a risk assessment and/or mitigation actions, and agreement by the competent authority.
- (g) Where the organisation has more than one location approved, the audit plan should ensure that each location is audited every year or at an interval determined through a risk assessment agreed by the competent authority and not exceeding the applicable audit planning cycle.
- (h) A report should be issued each time an audit is carried out describing what was checked and the resulting non-compliance findings against applicable requirements and procedures.

AMC3 CAMO.A.200(a)(6) Management system

COMPLIANCE MONITORING — CONTRACTING OF THE INDEPENDENT AUDIT

- (a) If external personnel are used to perform independent audits:
 - (1) any such audits are performed under the responsibility of the compliance monitoring manager; and
 - (2) the organisation remains responsible for ensuring that the external personnel have the relevant knowledge, backgrounds, and experience that are appropriate to the activities being audited, including knowledge and experience in compliance monitoring.
- (b) The organisation retains the ultimate responsibility for the effectiveness of the compliance monitoring function, in particular for the effective implementation and follow-up of all corrective actions.

AMC4 CAMO.A.200(a)(6) Management system

COMPLIANCE MONITORING — FEEDBACK SYSTEM

- (a) An essential element of the compliance monitoring is the feedback system.
- (b) The feedback system should not be contracted to external persons or organisations.
- (c) When a non-compliance is found, the compliance monitoring function should ensure that the root cause(s) and contributing factor(s) are identified (see GM1 CAMO.A.150), and that corrective actions are defined. The feedback part of the compliance monitoring function should define who is required to address any non-compliance in each particular case, and the procedure to be followed if the corrective action is not completed within defined time frame. The principal functions of the feedback system are to ensure that all findings resulting from the independent audits of the organisation are properly investigated and corrected in a timely manner, and to enable the accountable manager to be kept informed of any safety issues and the extent of compliance with Part-CAMO.
- (d) The independent audit reports referred to in AMC2 CAMO.A.200(a)(6) should be sent to the relevant department(s) for corrective action, giving target closure dates. These target dates should be discussed with the relevant department(s) before the compliance monitoring function confirms the dates in the report. The relevant department(s) are required to implement the corrective action and inform the compliance monitoring function of the status of the implementation of the action.
- (e) Unless the review of the results from compliance monitoring is the responsibility of the safety review board (ref. AMC1 CAMO.A.200(a)(1) point (b)(4)), the accountable manager should hold regular meetings with staff to check the progress of any corrective actions. These meetings may be delegated to the compliance monitoring manager on a day-to-day basis, provided that the accountable manager:
 - (1) meets the senior staff involved at least twice per year to review the overall performance of the compliance monitoring function; and
 - (2) receives at least a half-yearly summary report on non-compliance findings.

- (f) All records pertaining to the independent audit and the feedback system should be retained for the period specified in point CAMO.A.220(b) or for such periods as to support changes to the audit planning cycle in accordance with AMC2 CAMO.A.200(a)(6), whichever is the longer.

GM1 CAMO.A.200(a)(6) Management system

COMPLIANCE MONITORING FUNCTION

The compliance monitoring function is one of the elements that is required to be in compliance with the applicable requirements. This means that the compliance monitoring function itself should be subject to independent monitoring of compliance in accordance with point CAMO.A.200(a)(6).

AMC1 CAMO.A.202 Internal safety reporting scheme

GENERAL

- (a) Each internal safety reporting scheme should be confidential and enable and encourage free and frank reporting of any potentially safety-related occurrence, including incidents such as errors or near misses, safety issues and hazards identified. This will be facilitated by the establishment of a just culture.
- (b) The internal safety reporting scheme should contain the following elements:
- (1) clearly identified aims and objectives with demonstrable corporate commitment;
 - (2) a just culture policy as part of the safety policy, and related just culture implementation procedures;
 - (3) a process to:
 - (i) identify those reports which require further investigation; and
 - (ii) when so identified, investigate all the causal and contributing factors, including any technical, organisational, managerial, or human factors issues, and any other contributing factors related to the occurrence, incident, error or near miss that was identified;
 - (iii) if adapted to the size and complexity of the organisation, analyse the collective data showing the trends and frequencies of the contributing factor;
 - (4) appropriate corrective actions based on the findings of investigations;
 - (5) initial and recurrent training for staff involved in internal investigations;
 - (6) where relevant, the organisation should cooperate with the owner or operator on occurrence investigations by exchanging relevant information to improve aviation safety.
- (c) The internal safety reporting scheme should:
- (1) ensure confidentiality to the reporter;
 - (2) be closed-loop, to ensure that actions are taken internally to address any safety issues and hazards; and
 - (3) feed into the recurrent training as defined in AMC2 CAMO.A.305(g) whilst maintaining appropriate confidentiality.

- (d) Feedback should be given to staff both on an individual and a more general basis to ensure their continued support of the safety reporting scheme.

GM1 CAMO.A.202 Internal safety reporting scheme

GENERAL

- (a) The overall purpose of the internal safety reporting scheme is to collect information reported by the organisation personnel and use this reported information to improve the level of compliance and safety performance of the organisation. The purpose is not to attribute blame.
- (b) The objectives of the scheme are to:
- (1) enable an assessment to be made of the safety implications of each relevant incident (errors, near miss), safety issue and hazard reported, including previous similar issues, so that any necessary action can be initiated; and
 - (2) ensure that knowledge of relevant incidents, safety issues and hazards is shared so that other persons and organisations may learn from them.
- (c) The scheme is an essential part of the overall monitoring function and should be complementary to the normal day-to-day procedures and 'control' systems; it is not intended to duplicate or supersede any of them. The scheme is a tool to identify those instances in which routine procedures have failed or may fail.
- (d) All reports should be retained, as the significance of such reports may only become obvious at a later date.
- (e) The collection and analysis of timely, appropriate and accurate data will allow the organisation to react to information that it receives, and apply the necessary action.

GM1 CAMO.A.205 Contracting and subcontracting

RESPONSIBILITY WHEN CONTRACTING MAINTENANCE OR SUBCONTRACTING CONTINUING AIRWORTHINESS MANAGEMENT TASKS

- (a) Regardless of the approval status of the subcontracted organisations, the CAMO is responsible for ensuring that all subcontracted activities are subject to hazard identification and risk management, as required by point CAMO.A.200(a)(3), and to compliance monitoring, as required by point CAMO.A.200(a)(6).
- (b) A CAMO is responsible for identifying hazards that may stem from the existence of complex operational and maintenance arrangements (such as when multiple organisations are contracted, or when multiple levels of contracting/subcontracting are included) with due regard to the organisations' interfaces (see GM1 CAMO.A.200(a)(3)). In addition, the compliance monitoring function should at least check that the approval of the contracted maintenance organisation(s) effectively covers the contracted activities, and that it is still valid.
- (c) A CAMO is responsible for ensuring that interfaces and communication channels are established with the contracted maintenance organisation for occurrence reporting. This does not replace the obligation of the contracted organisation to report to the competent authority in accordance with Regulation (EU) No 1321/2014.

For subcontracted activities, interfaces and communication channels are also needed for the purpose of the internal safety reporting scheme (CAMO.A.202).

AMC1 CAMO.A.215 Facilities Facilities

GENERAL

Office accommodation should be such that the incumbents, whether they be continuing airworthiness management, planning, technical records or management system staff, can carry out their designated tasks in a manner that contributes to good standards. The competent authority may agree to these tasks being conducted from one office subject to being satisfied that there is sufficient space and that each task can be carried out without undue disturbance. Office accommodation should also include an adequate technical library and room for document consultation.

AMC1 CAMO.A.220 Record-keeping

GENERAL

- (a) The record-keeping system should ensure that all records are accessible within a reasonable time whenever they are needed. These records should be organised in a manner that ensures their traceability and retrievability throughout the required retention period.
- (b) Records should be kept in paper form, or in electronic format, or a combination of the two. Records that are stored on microfilm or in optical disc formats are also acceptable. The records should remain legible throughout the required retention period. The retention period starts when the record is created or was last amended.
- (c) Paper systems should use robust materials which can withstand normal handling and filing. Computer record systems should have at least one backup system, which should be updated within 24 hours of any new entry. Computer record systems should include safeguards to prevent unauthorised personnel from altering the data.
- (d) All computer hardware that is used to ensure the backup of data should be stored in a different location from the one that contains the working data, and in an environment that ensures that the data remains in good condition. When hardware or software changes take place, special care should be taken to ensure that all the necessary data continues to be accessible through at least the full period specified in the relevant provision. In the absence of any such indications, all records should be kept for a minimum period of 3 years.

AMC2 CAMO.A.220 Record-keeping

CONTINUING AIRWORTHINESS MANAGEMENT RECORDS

- (a) The CAMO should ensure that it always receives a complete CRS from the approved maintenance organisation, independent certifying staff (M.A.801(b)(1) and ML.A.801(b)(2)) and/or from the Pilot-owner such that the required records can be retained. The system to keep the continuing airworthiness records should be described in the CAME.
- (b) When a CAMO arranges for the relevant maintenance organisation to retain copies of the continuing airworthiness records on its behalf, it will nevertheless continue to be responsible for the records under point CAMO.A.220 relating to the preservation of records. If it ceases to

be the CAMO of the aircraft, it also remains responsible for transferring the records to any other person or organisation managing continuing airworthiness of the aircraft.

GM1 CAMO.A.220 Record-keeping

RECORDS

Microfilming or optical storage of records may be carried out at any time. The records should be as legible as the original record, and remain so for the required retention period.

AMC1 CAMO.A.220(c)(1)(ii) Record-keeping

RECORDS OF AIRWORTHINESS REVIEW STAFF

The following minimum information, as applicable, should be kept on record in respect of each airworthiness review staff:

- Name;
- Date of birth;
- Basic education;
- Experience;
- Aeronautical degree and/or Part-66 qualification and/or nationally-recognised maintenance personnel qualification;
- Initial training received;
- Type of training received;
- Recurrent training received;
- Experience in continuing airworthiness and within the organisation;
- Responsibilities of current role in the organisation;
- Copy of the authorisation.

AMC1 CAMO.A.300 Continuing airworthiness management exposition (CAME)

This AMC provides an outline of the layout of an acceptable CAME. Where an organisation uses a different format, for example, to allow the exposition to serve for more than one approval within the scope of Regulation (EU) 2018/1139, then the exposition should contain a cross-reference Annex using this list as an index with an explanation as to where the subject matter can be found in the exposition.

The information required by CAMO.A.300 should be provided, directly or by reference, in the CAME.

Part 0 General organisation, safety policy and objectives

- 0.1 Safety policy, objectives and accountable manager statement
- 0.2 General information and scope of work
- 0.3 Management personnel
- 0.4 Management organisation chart
- 0.5 Procedure for changes requiring prior approval
- 0.6 Procedure for changes not requiring prior approval
- 0.7 Procedure for alternative means of compliance (AltMoC)

Part 1 Continuing airworthiness management procedures

- 1.1a Use of aircraft continuing airworthiness record system and if applicable, aircraft technical log (ATL) system
- 1.1b MEL application
- 1.2 Aircraft maintenance programme (AMP) — development amendment and approval
- 1.3 Continuing airworthiness records: responsibilities, retention and access
- 1.4 Accomplishment and control of airworthiness directives
- 1.5 Analysis of the effectiveness of the maintenance programme(s)
- 1.6 Non-mandatory modification and inspections
- 1.7 Repairs and modifications
- 1.8 Defect reports
- 1.9 Engineering activity
- 1.10 Reliability programmes
- 1.11 Pre-flight inspections
- 1.12 Aircraft weighing
- 1.13 Maintenance check flight procedures

Part 2 Management system procedures

2.1	Hazard identification and safety risk management schemes
2.2	Internal safety reporting and investigations
2.3	Safety action planning
2.4	Safety performance monitoring
2.5	Change management
2.6	Safety training and promotion
2.7	Immediate safety action and coordination with operator's Emergency Response Plan (ERP)
2.8	Compliance monitoring
2.8.1	Audit plan and audit procedure
2.8.2	Monitoring of continuing airworthiness management activities
2.8.3	Monitoring of the effectiveness of the maintenance programme(s)
2.8.4	Monitoring that all maintenance is carried out by an appropriate maintenance organisation
2.8.5	Monitoring that all contracted maintenance is carried out in accordance with the contract, including subcontractors used by the maintenance contractor
2.8.6	Compliance monitoring personnel
2.9	Control of personnel competency
2.10	Management system record-keeping
2.11	Occurrence reporting
Part 3	Contracted maintenance — management of maintenance
3.1	Maintenance contractor selection procedure
3.2	Product audit of aircraft
Part 4	Airworthiness review procedures
4.1	Airworthiness review staff
4.2	Documented review of aircraft records
4.3	Physical survey
4.4	Additional procedures for recommendations to competent authorities for the import of aircraft
4.5	ARC recommendations to competent authorities
4.6	Issue of ARC
4.7	Airworthiness review records, responsibilities, retention and access
4.8	ARC extension
Part 4B	Permit to fly procedures
4B.1	Conformity with approved flight conditions
4B.2	Issue of the permit to fly under the CAMO privilege

4B.3	Permit to fly authorised signatories
4B.4	Interface with the local authority for the flight
4B.5	Permit to fly records, responsibilities, retention and access
Part 5 Supporting documents	
5.1	Sample documents, including the template of the ATL system
5.2	List of airworthiness review staff
5.3	List of subcontractors as per CAMO.A.125(d)(3)
5.4	List of contracted maintenance organisations and list of maintenance contracts as per point CAMO.A.300(a)(13)
5.5	Copy of contracts for subcontracted work (Appendix II to AMC1 CAMO.A.125(d)(3))
5.6	List of approved maintenance programme as per point CAMO.A.300(a)(12)
5.7	List of currently approved alternative means of compliance as per point CAMO.A.300(a)(13)

AMC2 CAMO.A.300 Continuing airworthiness management exposition (CAME)

- (a) Personnel should be familiar with those parts of the continuing airworthiness management exposition that are relevant to their tasks.
- (b) The CAMO should designate the person responsible for monitoring and amending the CAME, including associated procedure's manuals, in accordance with point CAMO.A.300(c).
- (c) The CAMO may use electronic data processing (EDP) for the publication of the CAME. Attention should be paid to the compatibility of the EDP systems with the necessary dissemination, both internally and externally, of the CAME.

GM1 CAMO.A.300 Continuing airworthiness management exposition (CAME)

The purpose of the CAME is to:

- specify the scope of work and shows how the organisation intends to comply with this Annex; and
- provides all the necessary information and procedures for the personnel of the organisation to perform their duties.

Complying with its contents will ensure the organisation remains in compliance with Part-CAMO and, as applicable, Part-M and/or Part-ML.

AMC1 CAMO.A.300(a)(1) Continuing airworthiness management exposition (CAME)

ACCOUNTABLE MANAGER STATEMENT

1. Part 0 'General organisation, safety policy and objectives' of the CAME should include a statement, signed by the accountable manager (and countersigned by the chief executive officer, if different), confirming that the CAME and any associated manuals will be complied with at all times.
2. The accountable manager's exposition statement as specified in point CAMO.A.300(a)(1) should embrace the intent of the following paragraph, and in fact, this statement may be used without amendment. Any amendment to the statement should not alter its intent:

'This exposition and any associated referenced manuals define the organisation and procedures upon which the competent authority's CAMO approval is based.*

These procedures are endorsed by the undersigned and must be complied with, as applicable, in order to ensure that all continuing airworthiness activities, including maintenance of the aircraft managed, are carried out on time to an approved standard.

These procedures do not override the necessity of complying with any new or amended regulation published from time to time where these new or amended regulations are in conflict with these procedures.

It is understood that the approval of the organisation is based on the continuous compliance of the organisation with Part-CAMO, Part-M and Part-ML, as applicable, and with the organisation's procedures described in this exposition. The competent authority is entitled to limit, suspend, or revoke the approval certificate if the organisation fails to fulfil the obligations imposed by Part-CAMO, Part-M and Part-ML, as applicable or any conditions according to which the approval was issued.*

In the case of air carriers licensed in accordance with Regulation (EC) No 1008/2008, suspension or revocation of the CAMO certificate will invalidate the AOC.

Signed

Dated

Accountable manager and ... (quote position) ...

Chief Executive Officer ...

For and on behalf of ... (quote organisation's name) ... '

**Where 'competent authority' is stated, please insert the actual name of the competent authority delivering the CAMO approval certificate or the air operator certificate.*

3. Whenever the accountable manager is changed, it is important to ensure that the new accountable manager signs the paragraph 2 statement at the earliest opportunity.

AMC1 CAMO.A.305(a) Personnel requirements

ACCOUNTABLE MANAGER

Accountable manager is normally intended to mean the chief executive officer of the CAMO, who by virtue of his or her position, has overall (including in particular financial) responsibility for running the organisation. The accountable manager may be the accountable manager for more than one organisation, and is not necessarily required to be knowledgeable on technical matters, as the CAME defines the continuing airworthiness standards. When the accountable manager is not the chief executive officer, the organisation should demonstrate to the competent authority that the accountable manager has direct access to the chief executive officer and has the necessary funding allocation for the continuing airworthiness management activities sought.

AMC1 CAMO.A.305(a)(3) Personnel requirements

MANAGEMENT STRUCTURE FOR CONTINUING AIRWORTHINESS MANAGEMENT

The person or group of persons nominated under point CAMO.A.305(a)(3) with the responsibility for ensuring compliance should represent the management structure of the organisation, and be responsible for the daily operation of the organisation, for all continuing airworthiness management functions.

Dependent on the size of the operation and the organisational set-up, the continuing airworthiness management functions may be divided under individual managers or combined in any number of ways.

GM1 CAMO.A.305(a)(3) Personnel requirements

RESPONSIBILITY FOR ENSURING COMPLIANCE

The person(s) nominated in accordance with CAMO.A.305(a)(3) are responsible, in the day-to-day continuing airworthiness management activities, for ensuring that the organisation personnel work in accordance with the applicable procedures and regulatory requirements.

These nominated persons should demonstrate a complete understanding of the applicable regulatory requirements, and ensure that the organisation's processes and standards accurately reflect the applicable requirements. It is their role to ensure that compliance is proactively managed, and that any early warning signs of non-compliance are documented and acted upon.

AMC1 CAMO.A.305(a)(4);(a)(5) Personnel requirements

SAFETY MANAGEMENT AND COMPLIANCE MONITORING FUNCTION

(a) Safety management

If more than one person is designated for the development, administration and maintenance of effective safety management processes, the accountable manager should identify the person who acts as the unique focal point, i.e. the 'safety manager'.

The functions of the safety manager should be to:

- (i) facilitate hazard identification, risk assessment and management;

- (ii) monitor the implementation of actions taken to mitigate risks, as listed in the safety action plan, unless action follow-up is addressed by the compliance monitoring function;
- (iii) provide periodic reports on safety performance to the safety review board (the functions of the safety review board are those defined in AMC1 CAMO.A.200(a)(1));
- (iv) ensure the maintenance of safety management documentation;
- (v) ensure that there is safety training available, and that it meets acceptable standards;
- (vi) provide advice on safety matters; and
- (vii) ensure the initiation and follow-up of internal occurrence investigations.

(b) **Compliance monitoring function**

If more than one person is designated for the compliance monitoring function, the accountable manager should identify the person who acts as the unique focal point, i.e. the 'compliance monitoring manager'.

(1) The role of the compliance monitoring manager should be to ensure that:

- (i) the activities of the organisation are monitored for compliance with the applicable requirements and any additional requirements as established by the organisation, and that these activities are carried out properly under the supervision of the nominated persons referred to in points CAMO.A.305(a)(3) to (a)(5).
- (ii) any contracted maintenance is monitored for compliance with the contract or work order;
- (iii) an audit plan is properly implemented, maintained, and continually reviewed and improved; and
- (iv) corrections and corrective actions are requested as necessary.

(2) The compliance monitoring manager should:

- (i) not be one of the persons referred to in point CAMO.A.305(a)(3);
- (ii) be able to demonstrate relevant knowledge, background and appropriate experience related to the activities of the organisation, including knowledge and experience in compliance monitoring; and
- (iii) have access to all parts of the organisation, and as necessary, any subcontracted organisation.

(c) If the functions related to compliance monitoring or safety management are combined with other duties, the organisation should ensure this does not result in any conflicts of interest. In particular, the compliance monitoring function should be independent from the continuing airworthiness management functions.

(d) If the same person is designated to manage both the compliance monitoring function and safety management-related processes and tasks, the accountable manager, with regard to his or her direct accountability for safety, should ensure that sufficient resources are allocated to both functions, taking into account the size of the organisation, and the nature and complexity of its activities.

(e) Subject to a risk assessment and/or mitigation actions, and agreement by the competent authority, with due regard to the size of the organisation and the nature and complexity of its activities, the compliance monitoring manager role and/or safety manager role may be

exercised by the accountable manager, provided that he or she has demonstrated the related competency as defined in point (b)(2)(ii) .

GM1 CAMO.A.305(a)(5) Personnel requirements

SAFETY MANAGER

- (a) Depending on the size of the organisation and the nature and complexity of its activities, the safety manager may be assisted by additional safety personnel in performing all the safety management tasks as defined in AMC1 CAMO.A.200(a)(1).
- (b) Regardless of the organisational set-up, it is important that the safety manager remains the unique focal point for the development, administration, and maintenance of the organisation's safety management processes.

AMC1 CAMO.A.305(b)(2) Personnel requirements

POST HOLDER

- (a) When the licensed air carrier intend to nominate a CAMO post holder who is also employed by a Part-145 organisation, it should justify why such nomination is being made and support it through a risk assessment and/or mitigation actions.
- (b) This paragraph only applies to contracted maintenance and therefore does not affect situations where the organisation approved under Part-145 and the air carrier licensed in accordance with Regulation (EC) No 1008/2008 are the same organisation.

AMC1 CAMO.A.305(c) Personnel requirements

KNOWLEDGE, BACKGROUND AND EXPERIENCE OF NOMINATED PERSON(S)

Persons or group of persons nominated in accordance with points CAMO.A.305(a) and CAMO.A.305(b) should have:

- (a) practical experience and expertise in the application of aviation safety standards and safe operating practices;
- (b) a comprehensive knowledge of:
 - (i) relevant parts of operational requirements and procedures;
 - (ii) the AOC holder's operations specifications when applicable;
 - (iii) the need for, and content of, the relevant parts of the AOC holder's operations manual when applicable.
- (c) knowledge of:
 - (i) human factors principles;
 - (ii) safety management systems based on the EU management system requirements (including compliance monitoring) and ICAO Annex 19.
- (d) 5 years of relevant work experience, of which at least 2 years should be from the aeronautical industry in an appropriate position;

- (e) a relevant engineering degree or an aircraft maintenance technician qualification with additional education that is acceptable to the competent authority. 'Relevant engineering degree' means an engineering degree from aeronautical, mechanical, electrical, electronic, avionic or other studies that are relevant to the maintenance and/or continuing airworthiness of aircraft/aircraft components;

The above recommendation may be replaced by 5 years of experience in addition to those already recommended by paragraph (d) above. These 5 years should cover an appropriate combination of experience in tasks related to aircraft maintenance and/or continuing airworthiness management and/or surveillance of such tasks;

- (f) thorough knowledge of the organisation's CAME;
- (g) knowledge of a relevant sample of the type(s) of aircraft gained through a formalised training course. These courses should be at least at a level equivalent to Part-66 Appendix III Level 1 General Familiarisation and could be provided by a Part-147 organisation, by the manufacturer, or by any other organisation accepted by the competent authority.

'Relevant sample' means that these courses should cover typical aircraft and aircraft systems that are within the scope of work.

For all balloons and any other aircraft of 2 730 kg MTOM or less, the formalised training courses may be replaced by a demonstration of the required knowledge by providing documented evidence, or by an assessment performed by the competent authority. This assessment should be recorded.

- (h) knowledge of maintenance methods;
- (i) knowledge of the applicable regulations.

AMC1 CAMO.A.305(d) Personnel requirements

SUFFICIENT NUMBER OF PERSONNEL

- (a) The actual number of persons to be employed and their necessary qualifications is dependent upon the tasks to be performed and thus dependent on the size, nature and complexity of the organisation (general aviation aircraft, corporate aircraft, number of aircraft and the aircraft types, complexity of the aircraft and their age and for commercial air transport, route network, line or charter, ETOPS) and the amount and complexity of maintenance contracting. Consequently, the number of persons needed, and their qualifications may differ greatly from one organisation to another and a simple formula covering the whole range of possibilities is not feasible.
- (b) To implement a system to plan the availability of staff and to enable the competent authority to accept the number of persons and their qualifications, the organisation should make an analysis of the tasks to be performed, the way in which it intends to divide and/or combine these tasks, indicate how it intends to assign responsibilities and establish the number of man/hours and the qualifications needed to perform the tasks. This analysis should be kept up to date and reviewed in case of significant changes to the organisation.
- (c) In addition, as part of its management system in accordance with point CAMO.A.200, the organisation should have a procedure to assess and mitigate risks:
- (1) when actual staff availability is less than the planned staffing level for any particular work shift or period;

- (2) in case of a temporary increase of the proportion of contracted staff for the purpose of meeting specific operational needs.

GM1 CAMO.A.305(f) Personnel requirements

PERSONS AUTHORISED TO EXTEND AIRWORTHINESS REVIEW CERTIFICATES

The approval by the competent authority of the exposition, containing, as specified in point CAMO.A.300(a)(5), the list of CAMO.A.305(f) personnel authorised to extend airworthiness review certificates, constitutes their formal acceptance by the competent authority and also their formal authorisation by the organisation.

Airworthiness review staff are automatically recognised as persons with authority to extend an airworthiness review certificate in accordance with points CAMO.A.125(e)(1), M.A.901(f) and ML.A.901(c).

AMC1 CAMO.A.305(g) Personnel requirements

COMPETENCY ASSESSMENT OBJECTIVES

The procedure referred to in CAMO.A.305(g) should require amongst others that technical support personnel such as, planners, engineers, and technical record staff, supervisors, post-holder, airworthiness review staff, whether employed or contracted, are assessed for competency before unsupervised work commences and competency is controlled on a continuous basis.

Competency should be assessed by the evaluation of:

- on-the-job performance and/or testing of knowledge by appropriately qualified personnel;
- records for basic, organisational, and/or product type and differences training; and
- experience records.

Validation of the above could include a confirmation check with the organisation(s) that issued such document(s). For that purpose, experience/training may be recorded in a document such as a log book.

As a result of this assessment, an individual's qualification should determine:

- which level of ongoing supervision would be required and whether unsupervised work could be permitted;
- whether there is a need for additional training.

A record should be kept of each individual qualifications and competency assessment (refer also to point CAMO.A.220(c)). This should include copies of all documents that attest to their qualifications, such as an authorisation held, as applicable.

For a proper competency assessment of its personnel, the organisation should consider that:

- (a) In accordance with the job function, adequate initial and recurrent training should be provided and recorded to ensure continued competency so that it is maintained throughout the duration of the employment/contract.
- (b) All staff should be able to demonstrate knowledge of, and compliance with, the CAMO procedures, as applicable to their duties.

- (c) All staff should be able to demonstrate an understanding of safety management principles including human factors, related to their job function and be trained as per AMC3 CAMO.A.305(g).
- (d) To assist in the assessment of competency and to establish the training needs analysis, job descriptions are recommended for each job function in the organisation. Job descriptions should contain sufficient criteria to enable the required competency assessment.
- (e) Criteria should allow the assessment to establish that, among other aspects (titles might be different in each organisation):
 - (1) Managers are able to properly manage processes, resources and priorities described in their assigned duties, accountabilities and responsibilities in accordance with the safety policy and objectives and in compliance with the applicable requirements and procedures.
 - (2) Maintenance programme engineers are able to interpret source data (norms, data issued by the holder of a design approval or by the competent authority, etc.) and use them to develop the aircraft maintenance programme.
 - (3) Engineering staff are able to interpret source data (norms, data issued by the holder of a design approval or by the competent authority, etc.) and use them as needed (e.g. to make work cards).
 - (4) Planners are able to organise maintenance activities in an effective and timely manner.
 - (5) Compliance monitoring staff are able to monitor compliance with this Regulation and to identify non-compliances in an effective and timely manner so that the organisation may remain in compliance with this Regulation.
 - (6) Staff who have been designated safety management responsibilities are familiar with the relevant processes in terms of hazard identification, risk management, and the monitoring of safety performance.
 - (7) All staff are familiar with the safety policy and the procedures and tools that can be used for internal safety reporting.
- (f) The competency assessment should be based upon the procedure specified in GM1 CAMO.A.305(g).

AMC2 CAMO.A.305(g) Personnel requirements

COMPETENCY ASSESSMENT PROCEDURE

- (a) The organisation should develop a procedure that describes the process for conducting competency assessment of personnel. The procedure should specify:
 - (1) the persons who are responsible for this process;
 - (2) when the assessment should take place;
 - (3) how to give credit from previous assessments;
 - (4) how to validate qualification records;
 - (5) the means and methods to be used for the initial assessment;

- (6) the means and methods to be used for the continuous control of competency, including to gather feedback on the performance of personnel;
 - (7) the aspects of competencies to be observed during the assessment in relation to each job function;
 - (8) the actions to be taken if the assessment is not satisfactory; and
 - (9) how to record assessment results.
- (b) Competency may be assessed by having the person work under the supervision of another qualified person for a sufficient time to arrive at a conclusion. Sufficient time could be as little as a few weeks if the person is fully exposed to relevant work. The person need not be assessed against the complete spectrum of their intended duties. If the person has been recruited from another approved CAMO, it is reasonable to accept a written confirmation from the previous organisation.
- (c) All prospective continuing airworthiness management staff should be assessed for their competency related to their intended duties.

AMC3 CAMO.A.305(g) Personnel requirements

SAFETY TRAINING (INCLUDING HUMAN FACTORS)

- (a) With respect to the understanding of the application of safety management principles (including human factors), all organisation personnel should be assessed for the need to receive initial safety training.

Personnel involved in the delivery of the basic continuing airworthiness management services of the organisation should receive both initial and recurrent safety training, appropriate for their responsibilities.

This should include at least the following staff members:

- nominated persons, line managers;
- persons involved in any compliance monitoring and/or safety management related processes and tasks, including application of human factors principles, internal investigations and safety training;
- Airworthiness review staff;
- Technical support personnel such as, planners, engineers, and technical record staff;
- Personnel involved in developing and amending/reviewing the AMP, in assessing its effectiveness and/or working on reliability programme; and
- Contract staff in the above categories.

The generic term 'line managers' refers to departmental head or person responsible for operational departments or functional units directly involved in the delivery of the basic continuing airworthiness management services of the organisation.

- (b) Initial safety training should cover all the topics of the training syllabus specified in GM2 CAMO.A.305(g) either as a dedicated course or else integrated within other training. The syllabus may be adjusted to reflect the particular nature of the organisation. The syllabus may also be adjusted to suit the particular nature of work for each function within the organisation.

Initial safety training compliant with the organisation's training standards should be provided to personnel identified in accordance with point (a) of this AMC within 6 months of joining the organisation, but temporary staff may need to be trained shortly after joining the organisation to cope with the duration of employment. Personnel being recruited from another organisation, and temporary staff should be assessed for the need to receive any additional safety training.

- (c) The purpose of recurrent safety training is primarily to ensure that staff remain current in terms of SMS principles and human factors, and also to collect feedback on safety and human factor issues. Consideration should be given to involving compliance monitoring staff and key safety management personnel in this training to provide a consistent presence and facilitate feedback. There should be a procedure to ensure that feedback is formally reported by the trainers through the internal safety reporting scheme to initiate action where necessary.

Recurrent safety training should be delivered either as a dedicated course or else integrated within other training. It should be of an appropriate duration in each 2-year period, in relation to the relevant compliance monitoring audit findings and other internal/external sources of information available to the organisation on safety and human factor issues.

- (d) Safety training may be conducted by the organisation itself, independent trainers, or any training organisations acceptable to the competent authority.

AMC4 CAMO.A.305(g) Personnel requirements

OTHER TRAININGS

- (a) The organisation should assess the need for particular training, for example with regards to the competency standards established in AMC 20-22 'Electrical Wiring Interconnection System' (EWIS), the AMC 20-20 'Continuing Structural Integrity Programme' or 'Critical Design Configuration Control' (CDCCL).
- (b) Guidance on fuel tank safety training is provided in Appendix III to AMC4 CAMO.A.305(g).
- (c) Those responsible for managing the compliance monitoring function should receive training on this task. Such training should cover the requirements of compliance monitoring, manuals and procedures related to the task, audit techniques, reporting, and recording.
- (d) Personnel involved in developing and amending/reviewing the AMP, in assessing its effectiveness and/or working on reliability programme, should have knowledge or be trained on statistical analysis and reliability method and the applicable methodology used in developing, as part of the ICA, the manufacturer recommended maintenance program (such as maintenance steering group logic).

AMC5 CAMO.A.305(g) Personnel requirements

INITIAL AND RECURRENT TRAINING

- (a) Adequate initial and recurrent training should be provided and recorded to ensure that staff remain competent.
- (b) Recurrent training should take into account certain information reported through the internal safety reporting scheme (see point (c)(3) of AMC1 CAMO.A.202).

GM1 CAMO.A.305(g) Personnel requirements

SAFETY TRAINING (INCLUDING HUMAN FACTORS)

- (a) The scope of the safety training and the related training programme will differ significantly depending on the size and complexity of the organisation. Safety training should reflect the evolving management system, and the changing roles of the personnel who make it work.
 - (b) In recognition of this, training should be provided to management and staff at least:
 - (1) during the initial implementation of safety management processes;
 - (2) for all new staff or personnel recently allocated to any safety management related task;
 - (3) on a regular basis to refresh their knowledge and to understand changes to the management system;
 - (4) when changes in personnel affects safety management roles, and related accountabilities, responsibilities, and authorities; and
- NOTE: In the context of safety management, the term 'authority' is used in relation to the level of management in the organisation that is necessary to make decisions related to risk tolerability.
- (5) when performing dedicated safety functions in domains such as safety risk management, compliance monitoring, internal investigations.
- (c) Safety training is subject to the record keeping requirements in point CAMO.A.220(c).

GM2 CAMO.A.305(g) Personnel requirements

TRAINING SYLLABUS FOR INITIAL SAFETY TRAINING

The training syllabus below identifies the topics and subtopics that should be addressed during the safety training.

The CAMO may combine, divide, or change the order of any of the subjects in the syllabus to suit its own needs, as long as all the subjects are covered to a level of detail that is appropriate for the organisation and its personnel, including the varying level of seniority of that personnel.

Some of the topics may be covered in separate training courses (e.g. health and safety, management, supervisory skills, etc.) in which case duplication of the training is not necessary.

Where possible, practical illustrations and examples should be used, especially accident and incident reports.

Topics should be related to existing legislation, where relevant. Topics should be related to existing guidance/advisory material, where relevant (e.g. ICAO HF Digests and Training Manual).

Topics should be related to continuing airworthiness management and maintenance engineering where possible; too much unrelated theory should be avoided.

- 1 General/Introduction to safety management and human factors
 - 1.1 Need to address safety management and human factors
 - 1.2 Statistics
 - 1.3 Incidents

- 1a. Safety risk management
 - 1a.1. Hazard identification
 - 1a.2. Safety risk assessment
 - 1a.3. Risk mitigation and management
 - 1a.4. Effectiveness of safety risk management
- 2 Safety Culture/Organisational factors
 - 2.1 Justness/Trust
 - 2.2 Commitment to safety
 - 2.3 Adaptability
 - 2.4 Awareness
 - 2.5 Behavior
 - 2.6 Information
- 3 Human error
 - 3.1 Error models and theories
 - 3.2 Types of errors in continuing airworthiness management and maintenance tasks
 - 3.3 Violations
 - 3.4 Implications of errors
 - 3.5 Avoiding and managing errors
 - 3.6 Human reliability
- 4 Human performance & limitations
 - 4.1 Vision
 - 4.2 Hearing
 - 4.3 Information-processing
 - 4.4 Attention and perception
 - 4.5 Situational awareness
 - 4.6 Memory
 - 4.7 Claustrophobia and physical access
 - 4.8 Motivation
 - 4.9 Fitness/Health
 - 4.10 Stress
 - 4.11 Workload management
 - 4.12 Fatigue
 - 4.13 Alcohol, medication, drugs
 - 4.14 Physical work

- 4.15 Repetitive tasks/complacency
- 5 Environment
- 5.1 Peer pressure
 - 5.2 Stressors
 - 5.3 Time pressure and deadlines
 - 5.4 Workload
 - 5.5 Shift Work
 - 5.6 Noise and fumes
 - 5.7 Illumination
 - 5.8 Climate and temperature
 - 5.9 Motion and vibration
 - 5.10 Complex systems
 - 5.11 Other hazards in the workplace
 - 5.12 Lack of manpower
 - 5.13 Distractions and interruptions
- 6 Procedures, information, tools and practices
- 6.1 Visual Inspection
 - 6.2 Work logging and recording
 - 6.3 Procedure - practice/mismatch/norms
 - 6.4 Technical documentation - access and quality
- 7 Communication
- 7.1 Shift/Task handover
 - 7.2 Dissemination of information
 - 7.3 Cultural differences
- 8 Teamwork
- 8.1 Responsibility
 - 8.2 Management, supervision and leadership
 - 8.3 Decision-making
- 9 Professionalism and integrity
- 9.1 Keeping up to date; currency
 - 9.2 Avoiding error-provoking behaviour
 - 9.3 Assertiveness
- 10 Organisation's safety programme
- 10.1 Safety policy and objectives, just culture principles
 - 10.2 Reporting errors and hazards, internal safety reporting scheme

- 10.3 investigation process
- 10.4 Action to address problems
- 10.5 Feedback and safety promotion

GM3 CAMO.A.305(g) Personnel requirements

COMPETENCY OF THE SAFETY MANAGER

The competency of a safety manager should include, but not be limited to, the following:

- (a) knowledge of ICAO standards and European requirements on safety management;
- (b) an understanding of management systems, including compliance monitoring systems;
- (c) an understanding of risk management;
- (d) an understanding of safety investigation techniques and root cause methodologies;
- (e) an understanding of human factors;
- (f) understanding and promotion of a positive safety culture;
- (g) operational experience related to the activities of the organisation;
- (h) safety management experience;
- (i) interpersonal and leadership skills, and the ability to influence staff;
- (j) oral and written communications skills;
- (k) data management, analytical and problem-solving skills.

AMC1 CAMO.A.310(a) Airworthiness review staff qualifications

GENERAL

- (a) Airworthiness review staff are only required if the CAMO wants to be granted CAMO.A.125(e) airworthiness review and, if applicable, CAMO.A.125(f) permit to fly privileges.
- (b) 'experience in continuing airworthiness' means any appropriate combination of experience in tasks related to aircraft maintenance and/or continuing airworthiness management and/or surveillance of such tasks.
- (c) A person qualified to the AMC1 CAMO.A.305(c) subparagraph (e) should be considered as holding the equivalent to an aeronautical degree.
- (d) An appropriate licence in compliance with Annex III (Part-66) is any one of the following:
 - a category B1 or L licence in the subcategory of the aircraft reviewed, or
 - a category B2 or C licence, or
 - in the case of piston-engine non-pressurised aeroplanes of 2 000 kg MTOM and below, a category B3 licence.

It is not necessary to satisfy the experience requirements of Part-66 at the time of the review.

- (e) To hold a position with appropriate responsibilities means the airworthiness review staff should have a position in the organisation independent from the airworthiness management process or with overall authority on the airworthiness management process of complete aircraft.

Independence from the airworthiness management process may be achieved, among other ways, by:

- Being authorised to perform airworthiness reviews only on aircraft for which the person has not participated in their management. For example, performing airworthiness reviews on a specific aircraft type, while being involved in the continuing airworthiness management of a different aircraft type.
- CAMO holding a maintenance organisation approval, may nominate maintenance personnel from their maintenance organisation as airworthiness review staff, as long as they are not involved in the airworthiness management of the aircraft. These personnel should not have been involved in the release to service of that particular aircraft (other than maintenance tasks performed during the physical survey of the aircraft or performed as a result of findings discovered during such physical survey) to avoid possible conflict of interests.
- Nominating as airworthiness review staff personnel from the compliance monitoring department of the CAMO.

Overall authority on the airworthiness management process of complete aircraft may be achieved, among other ways, by:

- Nominating as airworthiness review staff the accountable manager or the nominated post holder.
- Being authorised to perform airworthiness reviews only on those particular aircraft for which the person is responsible for the complete continuing airworthiness management process.
- In the case of one-man organisations, this person has always overall authority. This means that this person can be nominated as airworthiness review staff.

AMC1 CAMO.A.310(a)(3) Airworthiness review staff qualifications

FORMAL AERONAUTICAL MAINTENANCE TRAINING

Formal aeronautical maintenance training means training (internal or external) supported by evidence on the following subjects:

- Relevant parts of initial and continuing airworthiness regulations;
- Relevant parts of operational requirements and procedures, if applicable;
- The organisation's continuing airworthiness management exposition;
- Knowledge of a relevant sample of the type(s) of aircraft gained through a formalised training course. These courses should be at least at a level equivalent to Part-66 Appendix III Level 1 General Familiarisation and could be provided by a Part-147 organisation, by the manufacturer, or by any other organisation accepted by the competent authority.

'Relevant sample' means that these courses should cover typical typical aircraft and aircraft systems that are within the scope of work.

- Maintenance methods.

AMC1 CAMO.A.310(c) Airworthiness review staff qualifications

FORMAL ACCEPTANCE BY THE COMPETENT AUTHORITY

The approval by the competent authority of the CAME, containing, as specified in point CAMO.A.300(a)(8), the nominative list of CAMO.A.305(e) personnel, constitutes the formal acceptance by the competent authority of the airworthiness review staff.

If the airworthiness review is performed under the supervision of existing airworthiness review staff, evidence should be provided to the competent authority.

The inclusion of an airworthiness review staff in such CAME list also constitutes the formal authorisation by the organisation.

AMC1 CAMO.A.310(d) Airworthiness review staff qualifications

RECENT EXPERIENCE AND VALIDITY

In order to keep the validity of the airworthiness review staff authorisation, the airworthiness review staff should have either:

- been involved in continuing airworthiness management activities for at least 6 months in every two year period, or
- conducted at least one airworthiness review in the last 12 month period.

In order to restore the validity of the authorisation, the airworthiness review staff should conduct at a satisfactory level an airworthiness review under the supervision of the competent authority or, if accepted by the competent authority, under the supervision of another currently authorised airworthiness review staff of the concerned continuing airworthiness management organisation in accordance with an approved procedure.

GM1 CAMO.A.315 Continuing airworthiness management

The CAMO should have adequate knowledge of the design information and aircraft configuration (type specification, customer options, airworthiness directives (ADs), airworthiness limitations contained in the aircraft instructions for continuing airworthiness, modifications, repairs, operational and emergency equipment) and of the required and performed maintenance. The status of aircraft configuration and maintenance should be adequately documented to support the management system.

For CS-25 aeroplanes, adequate knowledge of the airworthiness limitations should cover those contained in CS-25 Book 1, Appendix H, paragraph H25.4 and fuel tank system airworthiness limitations including critical design configuration control limitations (CDCCL).

GM1 CAMO.A.315(b)(1) Continuing airworthiness management

AIRCRAFT MAINTENANCE PROGRAMME

In accordance with M.A.302 and ML.A.302, the CAMO requirement to 'control' the AMP includes in particular:

- (i) in the case of aircraft complying with Part-ML, the approval of the AMP and its amendments;
- (ii) in the case of aircraft complying with Part-M, the presentation of the AMP and its amendments to the competent authority for approval, unless the approval is covered by an indirect approval procedure in accordance with M.A.302(c).

AMC1 CAMO.A.315(b)(3) Continuing airworthiness management

When managing the approval of modifications or repairs, the organisation should ensure that Critical Design Configuration Control Limitations are taken into account.

AMC1 CAMO.A.315(b)(4) Continuing airworthiness management

ASSESSMENT OF NON-MANDATORY INFORMATION

The CAMO managing the continuing airworthiness of the aircraft should establish and work according to a policy, which assesses non-mandatory information (modification or inspections) related to the airworthiness of the aircraft. Non-mandatory information refers to service bulletins, service letters and other information that is produced for the aircraft and its components by an approved design organisation, the manufacturer, the competent authority or the Agency.

GM1 CAMO.A.315(b)(5) Continuing airworthiness management

This requirement means that the CAMO is responsible for determining what maintenance is required, when it has to be performed, by whom and to what standard in order to ensure the continuing airworthiness of the aircraft.

AMC1 CAMO.A.315(c) Continuing airworthiness management

- (a) As provided for in M.A.201 or ML.A.201, when the operator is approved as a CAMO, or when the operator/owner contracts a CAMO, this CAMO is in charge of the continuing airworthiness management and this includes the tasks specified:
 - for Part-M aircraft, in M.A.301 points (b), (c), (e), (f), (g) and (h);
 - for Part-ML aircraft, in ML.A.301 points (b), (c), (d) and (e).

If the CAMO does not hold the appropriate maintenance organisation approval (Part-M Subpart F, Part-CAO or a Part-145 approval), then the CAMO should conclude a contract with the appropriate organisation(s).

- (b) The CAMO bears the responsibility for the airworthy condition of the aircraft for which it performs the continuing airworthiness management. Thus, it should be satisfied before the intended flight that all required maintenance has been properly carried out.
- (c) The CAMO should agree with the operator on the process to select a maintenance organisation before concluding any contract with a maintenance organisation.
- (d) The fact that the CAMO has contracted a maintenance organisation should not prevent it from checking at the maintenance facilities on any aspect of the contracted work to fulfil its responsibility for the airworthiness of the aircraft.
- (e) The contract between the CAMO and the maintenance organisation(s) should specify in detail the responsibilities and the work to be performed by each party.
- (f) Both the specification of work and the assignment of responsibilities should be clear, unambiguous and sufficiently detailed to ensure that no misunderstanding arises between the parties concerned that could result in a situation where work that has an effect on the airworthiness or serviceability of aircraft is not or will not be properly performed.
- (g) Special attention should be paid to procedures and responsibilities to ensure that all maintenance work is performed, service bulletins are analysed and decisions are taken on their accomplishment, airworthiness directives are accomplished on time and that all work, including non-mandatory modifications, is carried out to approved data and to the latest standards.
- (h) Appendix IV to AMC1 CAMO.A.315(c) gives further details on the subject.

AMC2 CAMO.A.315(c) Continuing airworthiness management

MAINTENANCE CONTRACT WITH ANOTHER CAMO/OPERATOR

- (a) The purpose of point CAMO.A.315(c) is to ensure that all maintenance is carried out by an appropriately approved maintenance organisation. It is acceptable to contract another operator/CAMO (secondary operator/CAMO) that does not hold a maintenance organisation approval when it proves that such a contract is in the interest of the CAMO by simplifying the management of its maintenance, and the CAMO keeps an appropriate control of it. In this case the CAME should include appropriate procedures to ensure that all maintenance is ultimately carried out on time by approved maintenance organisations in accordance with appropriate maintenance data. In particular, the compliance monitoring, and safety risk management procedures should place great emphasis on monitoring compliance with the above and ensuring proper hazard identification, and management of risks associated with such contracting. The list of approved maintenance organisations, or a reference to this list, should be included in the CAME.
- (b) This contract should not preclude the CAMO from ensuring that all maintenance is performed by appropriately approved organisations which comply with the M.A.201 or ML.A.201. Typical arrangements are the following:
 - Component maintenance:

The CAMO may find it more appropriate to have a primary contractor (the secondary operator/CAMO) dispatching the components to appropriately approved organisations rather than sending themselves different types of components to various maintenance organisations approved under Part-145. The benefit for the CAMO is that the management of maintenance is simplified by having a single point of contact for component maintenance. The CAMO remains responsible for ensuring that all

maintenance is performed by maintenance organisations approved under Part-145 and in accordance with appropriate maintenance data.

– Aircraft, engine and component maintenance:

The CAMO may wish to have a maintenance contract with a secondary operator/CAMO not approved as maintenance organisation for the same type of aircraft. A typical case is that of a dry-leased aircraft between operators where the parties, for consistency or continuity reasons (especially for short-term lease agreements), find it appropriate to keep the aircraft under the current maintenance arrangement. Where this arrangement involves various maintenance organisations, it might be more manageable for the lessee CAMO to have a single maintenance contract with the lessor operator/CAMO. Whatever type of acceptable maintenance contract is concluded, the CAMO is required to exercise the same level of control on contracted maintenance, particularly through the person(s) nominated under point CAMO.A.305(a) and the management system as referred to in CAMO.A.200.

GM1 CAMO.A.315(c) Continuing airworthiness management

LINE MAINTENANCE CONTRACT

For line maintenance, the actual layout of the IATA Standard Ground Handling Agreement may be used as a basis, but this does not preclude the CAMO from ensuring that the content of the contract is acceptable and especially that the contract allows the CAMO to properly exercise its continuing airworthiness management responsibility. Those parts of the contract that have no effect on the technical or operational aspects of airworthiness are outside the scope of this paragraph.

GM1 CAMO.A.315(d) Continuing airworthiness management

WORK ORDERS

The intent of this paragraph is that maintenance contracts are not necessary when the continuing airworthiness management exposition specifies that the relevant maintenance activity may be ordered through one-time work orders. This includes unscheduled line maintenance and may also include component maintenance up to engines, as long as the maintenance is manageable through work orders, both in terms of volume and complexity. It should be noted that this paragraph implies that even where base maintenance is ordered on a case-by-case basis, there should be a written maintenance contract.

AMC1 CAMO.A.325 Continuing airworthiness management data

MAINTENANCE DATA PROVIDED BY THE CUSTOMER

When using maintenance data provided by the customer, the CAMO is responsible for ensuring that this data is current. As a consequence, it should establish appropriate procedures or provisions in the contract with the customer.

GM1 CAMO.A.325 Continuing airworthiness management data**MAINTENANCE DATA PROVIDED BY THE CUSTOMER**

The sentence '..., except when otherwise required by point (a) of point CAMO.A.220', means, in particular, the need to keep a copy of the customer data which was used to perform continuing airworthiness activities not only during the contract period but also, if considered as record pursuant to point CAMO.A.220(a)(2), for the period specified in point CAMO.A.220(a)(5).

GM2 CAMO.A.325 Continuing airworthiness management data

Point CAMO.A.325 refers to 'continuing airworthiness tasks referred to in point CAMO.A.315'. As a consequence, this covers continuing airworthiness management tasks but not airworthiness reviews.

Airworthiness review requirements are indicated in point CAMO.A.320 and the requirements for the corresponding record retention are contained in point CAMO.A.220.

SECTION B AUTHORITY REQUIREMENTS

GM1 CAMO.B.120 Means of compliance

ALTERNATIVE MEANS OF COMPLIANCE

Alternative means of compliance that are used by a competent authority, or by a CAMO under its oversight, may be used by other competent authorities or another CAMO only if they are processed again in accordance with points CAMO.B.120(d) and (e).

AMC1 CAMO.B.125(b) Information to the Agency

EXCHANGE OF SAFETY-SIGNIFICANT INFORMATION WITH THE AGENCY

Each competent authority should appoint a coordinator to act as the contact point for the exchange of safety-significant information between the competent authority and the Agency.

GM1 CAMO.B.125(b) Information to the Agency

MEANING OF SAFETY-SIGNIFICANT INFORMATION STEMMING FROM OCCURRENCE REPORTS

'Safety-significant information stemming from occurrence reports' means:

- (a) a conclusive safety analysis which summarises individual occurrence data and provides an in-depth analysis of a safety issue, and which may be relevant for the Agency's safety action planning; and
- (b) individual occurrence data for the cases where the Agency is the competent authority and which fulfils the reporting criteria of GM3 CAMO.B.125(b).

GM2 CAMO.B.125(b) Information to the Agency

RECOMMENDED CONTENT FOR CONCLUSIVE SAFETY ANALYSES

A conclusive safety analysis should contain the following:

- (a) a detailed description of the safety issue, including the scenario in which the safety issue takes place; and
- (b) an indication of the stakeholders affected by the safety issue, including types of operations and organisations;

and, as appropriate:

- (c) a risk assessment establishing the severity and probability of all the possible consequences of the safety issue;
- (d) information about the existing safety barriers that the aviation system has in place to prevent the likely safety issue consequences from occurring;
- (e) any mitigating actions already in place or developed to deal with the safety issue;

- (f) recommendations for future actions to control the risk; and
- (g) any other element the competent authority considers essential for the Agency to properly assess the safety issue.

GM3 CAMO.B.125(b) Information to the Agency

OCCURRENCES WHERE THE AGENCY IS THE COMPETENT AUTHORITY

Occurrences related to organisations or products, certified by the Agency, should be notified to the Agency if:

- (a) the occurrence is defined as a reportable occurrence in accordance with the applicable regulation;
- (b) the organisation responsible for addressing the occurrence is certified by the Agency; and
- (c) the Member State competent authority has come to the conclusion that:
 - (1) the organisation certified by the Agency to which the occurrence relates has not been informed of the occurrence; or
 - (2) the occurrence has not been properly addressed or has been left unattended by the organisation certified by the Agency.

Such occurrence data should be reported in a format compatible with the European Coordination Centre for Accident and Incident Reporting Systems (ECCAIRS) and should provide all relevant information for its assessment and analysis, including necessary additional files in the form of attachments.

AMC1 CAMO.B.200 Management system

ORGANISATIONAL STRUCTURE

- (a) In deciding upon the required organisational structure, the competent authority should review:
 - (1) the number of certificates to be issued, and the number and size of the potential CAMOs within that Member State;
 - (2) the possible use of qualified entities and of the resources of the competent authorities of other Member State to fulfil the continuing oversight obligations;
 - (3) the level of civil aviation activity, number and complexity of aircraft and the size of the Member State's aviation industry; and
 - (4) the potential growth of activities in the field of civil aviation.
- (b) The competent authority should retain effective control of important surveillance functions and should not delegate them in such a way that CAMOs, in effect, regulate themselves in airworthiness matters.
- (c) The set-up of the organisational structure should ensure that the various tasks and obligations of the competent authority do not solely rely on individuals. The continuous and undisturbed fulfilment of these tasks and obligations of the competent authority should also be guaranteed in case of illness, accident or leave of individual employees.

GM1 CAMO.B.200 Management system

GENERAL

- (a) The competent authority designated by each Member State should be organised in such a way that:
 - (1) there is specific and effective management authority in the conduct of all the relevant activities;
 - (2) the functions and processes described in the applicable requirements of Regulation (EU) 2018/1139 and its delegated and implementing acts, AMC, Certification Specifications (CSs), and Guidance Material (GM) may be properly implemented;
 - (3) the competent authority's organisation and operating procedures for the implementation of the applicable requirements of Regulation (EU) 2018/1139 and its delegated and implementing acts are properly documented and applied;
 - (4) all the competent authority's personnel who are involved in the related activities are provided with training where necessary;
 - (5) specific and effective provision is made for communicating and interfacing as necessary with EASA and the competent authorities of other Member States; and
 - (6) all the functions related to implementing the applicable requirements are adequately described.
- (b) A general policy in respect of the activities related to the applicable requirements of Regulation (EU) 2018/1139 and its delegated and implementing acts should be developed, promoted, and implemented by the manager at the highest appropriate level; for example, the manager at the top of the functional area of the competent authority that is responsible for such activities.
- (c) Appropriate steps should be taken to ensure that the policy is known and understood by all the personnel involved, and all the necessary steps should be taken to implement and maintain the policy.
- (d) The general policy, whilst also satisfying the additional national regulatory responsibilities, should, in particular, take into account:
 - (1) the provisions of Regulation (EU) 2018/1139;
 - (2) the provisions of the applicable implementing rules and their AMC, CSs, and GM;
 - (3) the needs of industry; and
 - (4) the needs of EASA and of the competent authority.
- (e) The policy should define specific objectives for the key elements of the organisation and processes for implementing the related activities, including the corresponding control procedures and the measurement of the achieved standard.

AMC1 CAMO.B.200(a)(1) Management system

DOCUMENTED POLICIES AND PROCEDURES

- (a) The various elements of the organisation involved with the activities related to Regulation (EU) 2018/1139 and its delegated and implementing acts should be documented in order to establish a reference source for the establishment and maintenance of this organisation.
- (b) The documented procedures should be established in a way that facilitates their use. They should be clearly identified, kept up to date, and made readily available to all the personnel who are involved in the related activities.
- (c) The documented procedures should cover, as a minimum, all of the following aspects:
 - (1) policy and objectives;
 - (2) organisational structure;
 - (3) responsibilities and associated authority;
 - (4) procedures and processes;
 - (5) internal and external interfaces;
 - (6) internal control procedures;
 - (7) the training of personnel;
 - (8) cross-references to associated documents;
 - (9) assistance from other competent authorities or EASA (where required).
- (d) It is likely that the information may be held in more than one document or series of documents, and suitable cross-referencing should be provided. For example, the organisational structure and job descriptions are not usually in the same documentation as the detailed working procedures. In such cases, it is recommended that the documented procedures should include an index of cross references to all such other related information, and the related documentation should be readily available when required.

GM1 CAMO.B.200(a)(2) Management system

SUFFICIENT PERSONNEL

- (a) This GM on the determination of the required personnel is limited to the performance of certification and oversight tasks, excluding any personnel who are required to perform tasks that are subject to any national regulatory requirements.
- (b) The elements to be considered when determining who are the required personnel and planning their availability may be divided into quantitative and qualitative elements:
 - (1) Quantitative elements:
 - (i) the estimated number of initial certificates to be issued;
 - (ii) the number of organisations to be certified by the competent authority;
 - (iii) the estimated number of subcontracted organisations used by certified organisations; and
 - (2) Qualitative elements:

- (i) the size, nature, and complexity of the activities of certified organisations, taking into account:
 - (A) the privileges of each organisation;
 - (B) the types of approval and the scope of approval;
 - (C) possible certification to industry standards;
 - (D) the number of personnel; and
 - (E) the organisational structure and the existence of subsidiaries;
 - (ii) the safety priorities identified;
 - (iii) the results of past oversight activities, including audits, inspections and reviews, in terms of risks and regulatory compliance, taking into account:
 - (A) the number and the level of findings;
 - (B) the time frame for implementation of corrective actions; and
 - (C) the maturity of the management systems implemented by organisations, and their ability to effectively manage safety risks; and
 - (iv) the size and complexity of the Member State's aviation industry, and the potential growth of activities in the field of civil aviation, which may be an indication of the number of new applications and changes to existing certificates to be expected.
- (c) Based on the existing data from previous oversight planning cycles, and taking into account the situation within the Member State's aviation industry, the competent authority may estimate:
- (1) the standard working time required for processing applications for new certificates;
 - (2) the number of new certificates to be issued for each planning period; and
 - (3) the number of changes to existing certificates to be processed for each planning period.
- (d) In line with the competent authority's oversight policy, the following planning data should be determined:
- (1) the standard number of audits to be performed per oversight planning cycle;
 - (2) the standard duration of each audit;
 - (3) the standard working time for audit preparation, on-site audit, reporting, and follow-up, per inspector;
 - (4) the standard number of unannounced inspections to be performed;
 - (5) the standard duration of inspections, including preparation, reporting, and follow-up, per inspector; and
 - (6) the minimum number and the required qualification of the inspectors for each audit/inspection.
- (e) The standard working time could be expressed either in working hours per inspector, or in working days per inspector. All planning calculations should then be based on the same unit (hours or working days).
- (f) It is recommended to use a spreadsheet application to process the data defined under (c) and (d), to assist in determining the total number of working hours/days per oversight planning cycle

required for certification, oversight and enforcement activities. This application could also serve as a basis for implementing a system for planning the availability of personnel.

- (g) The number of working hours/days per planning period for each qualified inspector that may be allocated for certification, oversight and enforcement activities should be determined, taking into account:
- (1) purely administrative tasks that are not directly related to certification and oversight;
 - (2) training;
 - (3) participation in other projects;
 - (4) planned absence; and
 - (5) the need to include a reserve for unplanned tasks or unforeseeable events.
- (h) The determination of the working time available for certification, oversight and enforcement activities should also consider, as applicable:
- (1) the use of qualified entities;
 - (2) cooperation with other competent authorities for approvals that involve more than one Member State;
 - (3) oversight activities under a bilateral aviation safety agreement.
- (i) Based on the elements listed above, the competent authority should be able to:
- (1) monitor the dates when audits and inspections are due, and when they were carried out;
 - (2) implement a system to plan the availability of personnel; and
 - (3) identify possible gaps between the number and qualification of personnel and the required volume of certification and oversight.

Care should be taken to keep planning data up to date in line with changes in the underlying planning assumptions, with particular focus on risk-based oversight principles.

AMC1 CAMO.B.200(a)(3) Management system

QUALIFICATION AND TRAINING — GENERAL

- (a) It is essential for the competent authority to have the full capability to adequately assess the compliance and performance of an organisation by ensuring that the whole range of activities is assessed by appropriately qualified personnel.
- (b) For each inspector, the competent authority should:
- (1) define the competencies required to perform the allocated certification and oversight tasks;
 - (2) define the associated minimum qualifications that are required;
 - (3) establish initial and recurrent training programmes in order to maintain and to enhance the competency of inspectors at the level that is necessary to perform the allocated tasks; and
 - (4) ensure that the training provided meets the established standards, and is regularly reviewed and updated whenever necessary.

- (c) The competent authority may provide training through its own training organisation with qualified trainers, or through another qualified training source.
- (d) If training is not provided through an internal training organisation, adequately experienced and qualified persons may act as trainers, provided that their training skills have been assessed. If required, an individual training plan should be established that covers specific training skills. Records should be kept of such training, and of the assessment, as appropriate.

AMC2 CAMO.B.200(a)(3) Management system

QUALIFICATION AND TRAINING - INSPECTORS

- (a) Competent authority inspectors should have:
 - (1) practical experience and expertise in the application of aviation safety standards and safe operating practices;
 - (2) comprehensive knowledge of:
 - (a) the relevant parts of the implementing rules, certification specifications and guidance material;
 - (b) the competent authority's procedures;
 - (c) the rights and obligations of an inspector;
 - (d) safety management systems based on the EU management system requirements (including compliance monitoring) and ICAO Annex 19;
 - (e) continuing airworthiness management including maintenance programme development and control;
 - (f) operational procedures that affect the continuing airworthiness management of the aircraft or its maintenance;
 - (g) maintenance-related human factors and human performance principles.
 - (3) training on auditing techniques and assessing and evaluating management systems and safety risk management processes.
 - (4) 5 years of relevant work experience for them to be allowed to work independently as inspectors. This may include experience gained during training to obtain the qualification mentioned below in point (a)(5);
 - (5) a relevant engineering degree or an aircraft maintenance technician qualification with additional education. 'Relevant engineering degree' refers to an engineering degree from aeronautical, mechanical, electrical, electronic, avionic or other studies that are relevant to the maintenance and continuing airworthiness of aircraft/aircraft components.
 - (6) knowledge of a relevant sample of the type(s) of aircraft gained through a formalised training course. These courses should be at least at a level equivalent to Part-66 Appendix III Level 1 General Familiarisation.

'Relevant sample' means that these courses should cover typical aircraft and aircraft systems that are within the scope of work.
 - (7) knowledge of maintenance standards, including fuel tank safety (FTS) training as described in Appendix III to AMC4 CAMO.A.305(g).

- (b) In addition to technical competency, inspectors should have a high degree of integrity, be impartial in carrying out their tasks, be tactful, and have a good understanding of human nature.
- (c) A programme for recurrent training should be developed that ensures that the inspectors remain competent to perform their allocated tasks. As a general policy, it is not desirable for the inspectors to obtain technical qualifications from those entities that are under their direct regulatory oversight.

AMC3 CAMO.B.200(a)(3) Management system

INITIAL AND RECURRENT TRAINING - INSPECTORS

- (a) Initial training programme:

The initial training programme for inspectors should include, as appropriate to their role, current knowledge, experience and skills in at least all of the following:

- (1) aviation legislation, organisation, and structure;
- (2) the Chicago Convention, the relevant ICAO annexes and documents;
- (3) Regulation (EU) No 376/2014 on the reporting, analysis and follow-up of occurrences in civil aviation;
- (4) overview of Regulation (EU) 2018/1139, its delegated and implementing acts and the related AMC, CS, and GM;
- (5) Regulation (EU) No 1321/2014 as well as any other applicable requirements;
- (6) management systems, including the assessment of the effectiveness of a management system, in particular hazard identification and risk assessment, and non-punitive reporting techniques in the context of the implementation of a 'just culture';
- (7) auditing techniques;
- (8) procedures of the competent authority that are relevant to the inspectors' tasks;
- (9) human factors principles;
- (10) the rights and obligations of inspecting personnel of the competent authority;
- (11) on-the-job training that is relevant to the inspector's tasks;
- (12) technical training, including training on aircraft-specific subjects, that is appropriate to the role and tasks of the inspector, in particular for those areas that require approvals.

NOTE: The duration of the on-the-job training should take into account the scope and complexity of the inspector's tasks. The competent authority should assess whether the required competency has been achieved before an inspector is authorised to perform a task without supervision.

- (b) Recurrent training programme

Once qualified, the inspector should undergo training periodically, as well as whenever deemed necessary by the competent authority, in order to remain competent to perform the allocated tasks. The recurrent training programme for inspectors should include, as appropriate to their role, at least the following topics:

- (1) changes in aviation legislation, the operational environment and technologies;

- (2) procedures of the competent authority that are relevant to the inspector's tasks;
 - (3) technical training, including training on aircraft-specific subjects, that is appropriate to the role and tasks of the inspector; and
 - (4) results from past oversight.
- (c) An assessment of an inspector's competency should take place at regular intervals that do not exceed 3 years. The results of these assessments, as well as any actions taken following the assessments, should be recorded.

AMC1 CAMO.B.200(a)(5) Management system

SAFETY RISK MANAGEMENT PROCESS

- (a) The safety risk management process required by point CAMO.B.200 should be documented. The following should be defined in the related documentation:
 - (1) means for hazard identification, and the related data sources, taking into account data that comes from other competent authorities with which the competent authority interfaces in the State, or from the competent authorities of other Member States;
 - (2) risk management steps including:
 - (i) analysis (in terms of the probability and the severity of the consequences of hazards and occurrences);
 - (ii) assessment (in terms of tolerability); and
 - (iii) control (in terms of mitigation) of risks to an acceptable level;
 - (3) who holds the responsibilities for hazard identification and risk management;
 - (4) who holds the responsibilities for the follow-up of risk mitigation actions;
 - (5) the levels of management who have the authority to make decisions regarding the tolerability of risks;
 - (6) means to assess the effectiveness of risk mitigation actions; and
 - (7) the link with the compliance monitoring function.
- (b) To demonstrate that the safety risk management process is operational, competent authorities should be able to provide evidence that:
 - (1) the persons involved in internal safety risk management activities are properly trained;
 - (2) hazards that could impact the authority's capabilities to perform its tasks and discharge its responsibilities have been identified and the related risk assessment is documented;
 - (3) regular meetings take place at appropriate levels of management of the competent authority to discuss the risks identified, and to decide on the tolerability of risks and possible risk mitigations;
 - (4) in addition to the initial hazard identification exercise, the risk management process is triggered as a minimum whenever changes occur that may affect the competent authority's capability to perform any of the tasks required by Part-CAMO;
 - (5) a record of the actions taken to mitigate risks is maintained, showing the status of each action and the owner of the action;

- (6) there is a follow-up on the implementation of all risk mitigation actions;
- (7) risk mitigation actions are assessed for their effectiveness;
- (8) the results of risk assessments are periodically reviewed to check whether they remain relevant. (Are the assumptions still valid? Is there new information?).

GM1 CAMO.B.200(a)(5) Management system

SAFETY RISK MANAGEMENT PROCESS

The purpose of safety risk management as part of the management system framework for competent authorities is to ensure the effectiveness of the management system. As for any organisation, hazard identification and risk management is expected to contribute to effective decision-making, to guide the allocation of resource and contribute to organisational success.

The safety risk management process required by point CAMO.B.200 is intended to address the safety risks that are directly related to the competent authority's organisation and processes, and which may affect its capability to perform its tasks and discharge its responsibilities. This process is not intended to be a substitute for the State safety risk management SARPs defined in ICAO Annex 19, Chapter 3, component 3.3. This does not mean, however, that the competent authority may not use information and data that is obtained through its State Safety Programme (SSP), including oversight data and information, for the purpose of safety risk management as part of its management system.

The safety risk management process is also to be applied to the management of changes (CAMO.B.210), which is intended to ensure that the management system remains effective whenever changes occur.

AMC1 CAMO.B.200(d) Management system

PROCEDURES AVAILABLE TO EASA

- (a) Copies of the procedures related to the competent authority's management system, and their amendments, that should be made available to EASA for the purpose of standardisation, should provide at least the following information:
 - (1) the competent authority's organisational structure for the continuing oversight functions that it undertakes, with a description of the main processes. This information should demonstrate the allocation of responsibilities within the competent authority, and that the competent authority is capable of carrying out the full range of tasks for the size and complexity of the Member State's aviation industry. It should also consider the overall proficiency and the scope of authorisation of the competent authority's personnel;
 - (2) for personnel who are involved in oversight activities, the minimum required professional qualification and amount of experience, and the principles that are used to guide their appointment (e.g. assessment);
 - (3) how the following are carried out: assessments of applications and evaluations of compliance, the issuing of certificates, continuing oversight activities, the follow-up of findings, enforcement measures and the resolution of safety concerns;
 - (4) the principles used for the management of exemptions and derogations;

- (5) the processes that are in place to distribute the applicable safety information to enable a timely reaction to a safety problem;
 - (6) the criteria for planning continuing oversight activities (i.e. oversight programme), including the management of interfaces when conducting continuing oversight activities (of air operations and of continuing airworthiness management, for example).
 - (7) an outline of the initial training of newly recruited oversight personnel (taking future activities into account), and the basic framework for the recurrent training of oversight personnel.
- (b) As part of the continuous monitoring of a competent authority, EASA may request details of the working methods used, in addition to a copy of the procedures of the competent authority's management system (and any amendments). These additional details are the procedures and the related guidance material that describes the working methods for the personnel of the competent authority who conduct oversight activities.
- (c) Information related to the competent authority's management system may be submitted in an electronic format.

GM1 CAMO.B.205 Allocation of tasks to qualified entities

CERTIFICATION TASKS

The tasks that may be performed by a qualified entity on behalf of the competent authority include those that are related to the initial certification and to the continuing oversight of persons and organisations as defined in Regulation (EU) No 1321/2014.

AMC1 CAMO.B.220(a) Record-keeping

GENERAL

- (a) The record-keeping system should ensure that all records are accessible within a reasonable time whenever they are needed. These records should be organised in a manner that ensures their traceability and retrievability throughout the required retention period.
- (b) All records that contain sensitive data regarding applicants or organisations should be stored in a secure manner with controlled access to ensure confidentiality.
- (c) Records should be kept in paper form or in electronic format or a combination of the two. Records that are stored on microfilm or optical discs are also acceptable. The records should remain legible and accessible throughout the required retention period. The retention period starts when the record is created.
- (d) Paper systems should use robust material which can withstand normal handling and filing. Computer record systems should have at least one backup system, which should be updated within 24 hours of any new entry. Computer record systems should include safeguards against any unauthorised personnel from altering the data.
- (e) All computer hardware that is used to ensure the backup of data should be stored in a different location from the one that contains the working data, and in an environment that ensures that the data remains in a good condition. When hardware or software changes take place special care should be taken to ensure that all the necessary data continues to be accessible throughout at least the full period specified in point CAMO.B.220(c).

AMC1 CAMO.B.220(a)(1) Record-keeping

COMPETENT AUTHORITY MANAGEMENT SYSTEM

Records that are related to the competent authority's management system should include, as a minimum, and as applicable:

- (a) the documented policies and procedures;
- (b) the personnel files of the competent authority's personnel, with the supporting documents related to their training and qualifications;
- (c) the results of the competent authority's internal audit and safety risk management processes, including audit findings, and corrective, preventive and risk mitigation actions; and
- (d) the contract(s) established with any qualified entities that perform certification or oversight tasks on behalf of the competent authority.

AMC1 CAMO.B.220(d) Record-keeping

REQUEST BY A COMPETENT AUTHORITY OF ANOTHER MEMBER STATE OR THE AGENCY

The cases, when records shall be made available should be limited to:

- incidents or accidents;
- findings through the aircraft continuing airworthiness monitoring (ACAM) programme where organisations approved by another competent authority are involved, to determine the root cause;
- aircraft mainly operated in another Member State;
- aircraft previously operated in another Member State;
- organisation having approvals in several Member States.

When records are requested from another Member State, the reason for the request should be clearly stated. The records can be made available by sending a copy or by allowing their consultation.

AMC1 CAMO.B.300(a);(b);(c) Oversight principles

MANAGEMENT SYSTEM ASSESSMENT

As part of the initial certification of an organisation, the competent authority should assess the organisation's management system and processes to make sure that all the required enablers of a functioning management system are present and suitable.

As part of its continuing oversight activities, the competent authority should verify that the required enablers remain present and operational, and assess the effectiveness of the organisation's management system and processes.

When significant changes take place in the organisation, the competent authority should determine whether there is a need to review the existing assessment to ensure that it is still appropriate.

AMC1 CAMO.B.300(f) Oversight principles

INFORMATION DEEMED USEFUL FOR OVERSIGHT

This information should include, as a minimum:

- (a) any occurrence reports received by the competent authority;
- (b) the results of the following types of inspections and surveys if they indicate an issue that originates from a Part-CAMO organisation:
 - (i) ramp inspections performed in accordance with Subpart RAMP of Annex II (Part-ARO) of Commission Regulation (EC) No 965/2012 'Air Operations';
 - (ii) product surveys of aircraft pursuant to points M.B.303 or ML.B.303;
 - (iii) results of aircraft sample surveys conducted pursuant to point CAMO.B.305(b)(1); and
 - (iv) results of physical surveys or partial airworthiness reviews performed by the competent authority in line with point M.B.901.

AMC1 CAMO.B.305(a);(b) Oversight programme

ANNUAL REVIEW

- (a) The oversight planning cycle and the related oversight programme for each organisation should be reviewed annually to ensure that they remain adequate regarding any changes in the nature, complexity or the safety performance of the organisation.
- (b) When reviewing the oversight planning cycle and the related oversight programme, the competent authority should also consider any relevant information collected in accordance with points CAMO.A.160 and CAMO.B.300(f).

AMC1 CAMO.B.305(b) Oversight programme

SPECIFIC NATURE AND COMPLEXITY OF THE ORGANISATION, RESULTS OF PAST OVERSIGHT

When determining the oversight programme, including the product audits, the competent authority should consider in particular the following elements, as applicable:

- (1) the effectiveness of the organisation's management system in identifying and addressing non-compliances and safety hazards;
- (2) the implementation by the organisation of any industry standards that are directly relevant to the organisation's activity subject to this Regulation;
- (3) the procedure applied for and the scope of changes not requiring prior approval;
- (4) any specific procedures implemented by the organisation that are related to any alternative means of compliance used;
- (5) the number of approved locations and the activities performed at each location ;
- (6) the number and type of any subcontractors who perform continuing airworthiness management tasks; and
- (7) the volume of activity for each aircraft type / series / group, as applicable.

AMC2 CAMO.B.305(b) Oversight programme

SUBCONTRACTED ACTIVITIES

When a CAMO subcontracts continuing airworthiness management tasks, all subcontracted organisations should also be audited by the competent authority at periods not exceeding the applicable oversight planning cycle (credits per AMC2 CAMO.B.305(c) point (d) are permitted) to ensure that the subcontracted continuing airworthiness management tasks are carried out in compliance with Part-CAMO, Part-M and Part-ML, as applicable.

For these audits, the competent authority inspector should ensure that he or she is accompanied throughout the audit by a senior technical member of the CAMO.

NOTE: When a CAMO subcontracts continuing airworthiness management tasks, the competent authority should also ensure that the CAMO has sufficient control over the subcontracted organisation (see AMC1 CAMO.A.125(d)(3)).

AMC1 CAMO.B.305(b)(1) Oversight programme

AUDIT

- (a) The oversight programme should indicate which aspects of the approval will be covered by each audit.
- (b) Part of each audit should concentrate on the audit reports produced by the organisation's compliance monitoring function, to determine whether the organisation has been identifying, and correcting its problems.
- (c) At the conclusion of the audit, the auditing inspector should complete an audit report that identifies the areas and processes that were audited, and includes all findings that were raised.
- (d) At the completion of each oversight planning cycle, a new EASA Form 13-CAMO should be issued.

AMC1 CAMO.B.305(c) Oversight programme

OVERSIGHT PLANNING CYCLE—AUDIT AND INSPECTION

- (a) When determining the oversight planning cycle and defining the oversight programme, the competent authority should assess the risks related to the activity of each organisation, and adapt the oversight to the level of risk identified and to the effectiveness of the organisation's management system, in particular its ability to effectively manage safety risks.
- (b) The competent authority should establish a schedule of audits and inspections that is appropriate to each organisation. The planning of audits and inspections should take into account the results of the hazard identification and the risk assessment conducted and maintained by the organisation as part of the organisation's management system. Inspectors should work in accordance with the schedule provided to them.
- (c) When the competent authority, having regard to the level of risk identified and the effectiveness of the organisation's management system, varies the frequency of an audit or inspection, it should ensure that all aspects of the organisation's activity are audited and inspected within the applicable oversight planning cycle.

AMC2 CAMO.B.305(c) Oversight programme

OVERSIGHT PLANNING CYCLE— AUDIT

- (a) For each organisation certified by the competent authority, all processes should be completely audited at periods that do not exceed the applicable oversight planning cycle. The beginning of the first oversight planning cycle is normally determined by the date of issue of the first certificate. If the competent authority wishes to align the oversight planning cycle with the calendar year, it should shorten the first oversight planning cycle accordingly.
- (b) The interval between two audits for a particular process should not exceed the interval of the applicable oversight planning cycle.
- (c) Audits should include at least one on-site audit within each oversight planning cycle. For organisations who carry out their regular activity at more than one site, the determination of the sites to be audited should consider the results of past oversight activities and the volume of activities at each site, as well as main risk areas identified.
- (d) For organisations holding more than one certificate, the competent authority may define an integrated oversight schedule to include all the applicable audit items. In order to avoid any duplication of audits, credit may be granted for specific audit items that have already been completed during the current oversight planning cycle, provided that:
 - (1) the specific audit item is the same for all the certificates under consideration;
 - (2) there is satisfactory evidence on record that those specific audit items were carried out, and that all the related corrective actions have been implemented to the satisfaction of the competent authority;
 - (3) the competent authority is satisfied that there is no evidence that standards have deteriorated regarding those specific audit items for which credit is granted;
 - (4) the interval between 2 audits for the specific item for which credit is granted does not exceed the applicable oversight planning cycle.

AMC1 CAMO.B.305(d) Oversight programme

EXTENSION OF THE OVERSIGHT PLANNING CYCLE BEYOND 24 MONTHS

- (a) If the competent authority applies an oversight planning cycle that exceeds 24 months, it should, at a minimum, perform one focused inspection of the organisation (inspection of a specific area, element or aspect of the organisation) within each 12-month segment of the cycle to support the extended oversight programme.

NOTE: Where another inspection can be linked to the oversight of the organisation (e.g. when an aircraft managed by the organisation is inspected through ACAM survey), then the competent authority may take credit of such inspection to maintain the extension beyond 24 months.

- (b) If the results of this inspection indicate a decrease in the safety performance or regulatory compliance of the organisation, the competent authority should revert back to a 24-month (or less) oversight planning cycle and review the oversight programme accordingly.

- (c) In order to be able to approve an oversight planning cycle of beyond 36 months, the competent authority should agree on the format and contents of the continuous reporting to be made by the organisation on its safety performance and regulatory compliance.

AMC1 CAMO.B.310 Initial certification procedure

VERIFICATION OF COMPLIANCE

- (a) In order to verify the organisation's compliance with the applicable requirements, the competent authority should conduct an audit of the organisation, including interviews of the personnel, and inspections carried out at the organisation's facilities.
- (b) The competent authority should only conduct such an audit if it is satisfied that the application and the supporting documentation, including the results of the pre-audit performed by the organisation, are in compliance with the applicable requirements.
- (c) The audit should focus on the following areas:
- (1) the detailed management structure, including the names and qualifications of personnel required by points CAMO.A.305(a) and (b)(2), and the adequacy of the organisation and its management structure;
 - (2) the personnel:
 - (i) the adequacy of the number of staff, and of their qualifications and experience with regard to the intended terms of approval and the associated privileges;
 - (ii) the validity of licences and/or authorisations, as applicable;
 - (3) the processes for safety risk management and compliance monitoring;
 - (4) the facilities and their adequacy regarding the organisation's scope of work;
 - (5) the documentation based on which the certificate should be granted (i.e. the documentation required by Part-CAMO):
 - (i) verification that the procedures specified in the CAME comply with the applicable requirements; and
 - (ii) verification that the accountable manager has signed the exposition statement.
- (d) If an application for an organisation certificate is refused, the applicant should be informed of the right of appeal that exists under national law.

AMC1 CAMO.B.310(a) Initial certification procedure

AUDIT

- (a) The competent authority should determine how and by whom the audit shall be conducted. For example, it will be necessary to determine whether one large team audit, a short series of small team audits, or a long series of single inspector audits is most appropriate for the particular situation.
- (b) The audit may be structured so as to verify the organisation's processes related to a product line. For example, in the case of an organisation with Airbus A320 and Airbus A310 ratings, the audit should concentrate on the continuing airworthiness management processes of one type

only for a full compliance check, and depending upon the result, the second type may only require a sample check against those aspects that were seen to be weak regarding compliance for the first type.

- (c) In determining the scope of the audit and which activities of the organisation will be assessed during the audit, the privileges of the approved organisation should be taken into account, e.g. their approval to carry out airworthiness reviews.
- (d) The competent authority auditing inspector should always ensure that he or she is accompanied throughout the audit by a senior member of the organisation, who is normally the compliance monitoring manager. The reason for being accompanied is to ensure that the organisation is fully aware of any findings raised during the audit.
- (e) At the end of the audit, the auditing inspector should inform the senior member of the organisation of all the findings that were raised during the audit.

AMC1 CAMO.B.310(c) Initial certification procedure

- (a) There may be occasions when the competent authority inspector is unsure about the compliance of some aspects of the applicant's organisation. If this occurs, the inspector should inform the organisation about the possible non-compliance at the time, and about the fact that the situation will be reviewed within the competent authority before a decision is made. If the review concludes that there is no finding, then a verbal confirmation to the organisation should suffice.
- (b) Findings should be recorded on the audit report form, each with a provisional categorisation as a level 1 or 2 finding. Subsequent to the on-site audit that identified the particular findings, the competent authority should review the provisional finding levels, adjusting them if necessary, and should change the categorisation from 'provisional' to 'confirmed'.

AMC2 CAMO.B.310(c) Initial certification procedure

- (a) The audit should be recorded using the audit report EASA Form 13-CAMO (Appendix V to AMC2 CAMO.B.310(c)).
- (b) A review of the EASA Form 13-CAMO audit report should be carried out by a competent independent person nominated by the competent authority. The review should take into account the relevant points of Part-CAMO, the categorisation of the finding levels and the closure action that was taken. A satisfactory review of the audit report should be indicated by a signature on the EASA Form 13-CAMO.
- (c) The audit reports should include the date when each finding was closed, together with a reference to the competent authority report or letter that confirmed the closure.

AMC1 CAMO.B.310(d) Initial certification procedure

All findings should be confirmed in writing to the applicant organisation within 2 weeks of the on-site audit.

GM1 CAMO.B.310(e)(1); CAMO.B.330 Initial certification procedure and changes

TERMS OF APPROVAL

The table shown for the terms of approval in EASA Form 14 includes a field designated as 'Aircraft type/series/group'.

The intention is to give maximum flexibility to the competent authority to customise the approval to a particular organisation.

Possible alternatives to be included in this field are the following:

- A specific type designation that is part of a type certificate, such as Airbus 340-211 or Cessna 172R.
- A type rating (or series) as listed in Part-66 Appendix I to AMC, which may be further subdivided, such as Boeing 737-600/700/800, Boeing 737-600, Cessna 172 Series.
- An aircraft group such as, for example, 'all sailplanes and powered sailplanes' or 'Cessna single piston engine aircraft' or 'Group 3 aircraft' (as defined in 66.A.5) or 'aircraft below 2 730 kg MTOM'.

Reference to the engine type installed in the aircraft may or may not be included, as necessary.

It is important to note that the terms of approval defined in EASA Form 14 is further limited to the scope of work defined in the CAME. It is this scope of work in the CAME which ultimately defines the approval of the organisation. As a consequence, it is possible for a competent authority to endorse in EASA Form 14, for example, a scope of work for Group 3 aircraft while the detailed scope of work defined in the CAME does not include all Group 3 aircraft.

Nevertheless, in all cases, the competent authority should be satisfied that the organisation has the capability to manage the types/groups/series endorsed in the EASA Form 14.

Since the activities linked to continuing airworthiness management are mainly process-oriented rather than facility/tooling-oriented, changes to the detailed scope of work defined in the CAME (either directly or through a capability list), within the limits already included in EASA Form 14, may be considered as not affecting the approval and not subject to point CAMO.A.130(a). As a consequence, for these changes the competent authority may allow the use by the CAMO of the procedure referred to in point CAMO.A.130(c) for changes not requiring prior approval.

Since, as mentioned above, the competent authority should make sure that the organisation is capable of managing the requested category as a whole, it is not reasonable to grant a full Group 3 approval based on an intended scope of work which is limited to, for example, a Cessna 172 aircraft. However, it may be reasonable to grant such full Group 3 approval, after showing appropriate capability, for an intended scope of work covering several aircraft types or series of different complexity and which are representative of the full Group 3. In such case if later on, changes need to be introduced in the detailed scope of work detailed in the CAME to include new aircraft types (within Group 3), this may be done by the procedure referred to in point CAMO.A.130(c).

Special case for ELA1 aircraft:

In order to promote standardisation, for this category of aircraft the following approach is recommended:

- Possible ratings to be endorsed in EASA Form 14:

- ELA1 sailplanes;
- ELA1 powered sailplanes and ELA1 aeroplanes;
- ELA1 balloons;
- ELA1 airships.
- Before endorsing any of those ratings (for example, ELA1 sailplanes) in EASA Form 14, the competent authority should audit that the organisation is capable of managing at least one aircraft type (for example, one type of sailplanes within the ELA1 category), including the availability of the necessary facilities, data, maintenance programmes, and staff.

AMC1 CAMO.B.310(e)(2) Initial certification procedure

- (a) The competent authority should indicate its approval of the CAME in writing.
- (b) Contracts for subcontracting continuing airworthiness management tasks by CAMOs should be included in the continuing airworthiness organisation exposition. The competent authorities should verify that the standards set forth in AMC1 CAMO.A.125(d)(3) have been met when approving the exposition.
- (c) The competent authority while investigating the acceptability of the proposed subcontracted continuing airworthiness management tasks arrangements will take into account, in the subcontracted organisation, all other such contracts that are in place irrespective of state of registry in terms of sufficiency of resources, expertise, management structure, facilities and liaison between the CAMO, the subcontracted organisation and, where applicable, the contracted maintenance organisation(s).
- (d) Approval of the CAME constitutes formal acceptance of personnel specified in points CAMO.A.305(a), CAMO.A.305(b)(2), CAMO.A.305(e) and CAMO.A.305(f).
- (e) The competent authority may reject an accountable manager if there is clear evidence that this person previously held a senior position in any organisation that was approved in accordance with Regulation (EU) 2018/1139 and its delegated and implementing acts, and that the person abused that position by not complying with the applicable requirements.
- (e) For CAT, commercial specialised operations and commercial ATO or commercial DTO operations, the initial approval of the aircraft technical log system required by M.A.306(b) and M.B.305 may be done by approving the CAME in which this system should be described.

AMC1 CAMO.B.330 Changes

- (a) The competent authority should have adequate control over any changes to the personnel specified in points CAMO.A.305(a), (b)(2), (e) and (f). Such changes in personnel will require an amendment to the exposition.
- (b) When an organisation submits the name of a new nominee for any of the personnel specified in points CAMO.A.305(a), (b)(2) and (e), the competent authority may require the organisation to produce a written résumé of the proposed person's qualifications. The competent authority should reserve the right to interview the nominee or call for additional evidence of his or her suitability before deciding upon him or her being acceptable.

- (c) For changes requiring prior approval, in order to verify the organisation's compliance with the applicable requirements, the competent authority should conduct an audit of the organisation, limited to the extent of the changes, and determine whether a risk assessment needs to be provided by the organisation.
- (d) If a risk assessment is deemed to be necessary, the competent authority should inform the organisation accordingly.
- (e) If the competent authority considers that it is necessary to review the risk assessment performed by the organisation, it should request the organisation to provide it, and assess its result.
- (f) If required, the audit may include interviews and inspections carried out at the organisation's facilities.
- (g) The applicable part(s) of the EASA Form 13-CAMO should be used to document the assessment of any changes to the Part-CAMO approval.

GM1 CAMO.B.330 Changes

CHANGE OF THE NAME OF THE ORGANISATION

- (a) On receipt of the application and the amendment to the relevant parts of the CAME, the competent authority should reissue the certificate.
- (b) A change of only the name does not require the competent authority to audit the organisation unless there is evidence that other aspects of the organisation have changed.

AMC1 CAMO.B.355(c) Suspension, limitation and revocation

INFORMATION ON THE SECURITY SITUATION

- (a) The European Commission Security Directorate generally advises against any non-essential travel to a country where hostile conditions, or a combination of the following conditions, reduce the level of security, and pose a high level of threat to personnel, as follows:
 - (1) international or internal armed conflict with frequent armed confrontation taking place, numerous casualties, and/or serious damages to infrastructures;
 - (2) a situation that could lead to war, or characterised by high internal or external tension that could escalate into instability in the short term; very poorly functioning institutions;
 - (3) relatively frequent terrorist attacks due to the presence of active terrorist groups, either domestic or transnational, and state authorities that are unable to ensure a satisfactory level of security; and
 - (4) frequent criminal violence that also targets non-nationals. State authorities have a limited ability to counter criminal activities and ensure security.
- (b) Countries where the above conditions apply should not be considered to be compatible with the performance of on-site audit by the competent authority.

AMC AND GM TO APPENDICES TO PART-CAMO

AMC1 to Appendix I to Part-CAMO — Continuing Airworthiness Management Organisation Certificate

EASA FORM 14

The following fields on page 2 'CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION - TERMS OF APPROVAL' of the EASA Form 14 certificate should be completed as follows:

- Date of original issue: It refers to the date of the original issue of the continuing airworthiness management exposition
- Date of this revision: It refers to the date of the last revision of the continuing airworthiness management exposition affecting the content of the certificate. Changes to the continuing airworthiness management exposition which do not affect the content of the certificate do not require the reissuance of the certificate.
- Revision No: It refers to the revision No of the last revision of the continuing airworthiness management exposition affecting the content of the certificate. Changes to the continuing airworthiness management exposition which do not affect the content of the certificate do not require the reissuance of the certificate.

APPENDICES TO AMC AND GM TO PART-CAMO

Appendix I to AMC1 CAMO.A.115 — EASA Form 2

The provisions of Appendix IX to AMC M.A.602 and AMC M.A.702 EASA Form 2 apply.

Appendix II to AMC1 CAMO.A.125(d)(3) — Subcontracting of continuing airworthiness management tasks

1. Subcontracted continuing airworthiness management tasks

- 1.1. To actively control the standards of the subcontracted organisation, the CAMO should employ a person or group of persons who are trained and competent in the disciplines associated with Part-CAMO. As such, they are responsible for determining what maintenance is required, when it has to be performed, by whom and to what standard in order to ensure the continuing airworthiness of the aircraft to be operated.
- 1.2. The CAMO should conduct a pre-subcontract audit to establish that the organisation to be subcontracted can achieve the standards required by Part-CAMO in connection with those activities to be subcontracted.
- 1.3. The CAMO should ensure that the organisation to be subcontracted has sufficient and qualified personnel who are trained and competent in the functions to be subcontracted. In assessing the adequacy of personnel resources, the CAMO should consider the particular needs of those activities that are to be subcontracted, while taking into account the subcontracted organisations existing commitments.
- 1.4. To be appropriately approved to subcontract continuing airworthiness management tasks, the CAMO should have procedures for the management control of these arrangements. The CAME should contain relevant procedures to reflect its control of those arrangements made with the subcontracted organisation.
- 1.5. Subcontracted continuing airworthiness management tasks should be addressed in a contract between the CAMO and the subcontracted organisation. The contract should also specify that the subcontracted organisation is responsible for informing the CAMO that is in turn responsible for notifying the respective competent authority, of any subsequent changes that affect their ability to fulfil the contract.
- 1.6. The subcontracted organisation should use procedures which set out the manner of fulfilling its responsibilities with regard to the subcontracted activities. Such procedures may be developed by either the subcontracted organisation or the CAMO.
- 1.7. Where the subcontracted organisation develops its own procedures, they should be compatible with the CAME and the terms of the contract. These should be accepted by the competent authority as extended procedures of the CAMO and as such should be cross-referenced from the CAME. One current copy of the subcontracted organisation's relevant procedures should be kept by the CAMO and should be accessible to the competent authority when needed.

Note: Should any conflict arise between the subcontracted organisation's procedures and those of the CAMO, then the policy and procedures of the CAME will prevail.

- 1.8. The contract should also specify that the subcontracted organisation's procedures may only be amended with the agreement of the CAMO. The CAMO should ensure that these amendments are compatible with its CAME and comply with Part-CAMO.

The CAMO should nominate the person responsible for continued monitoring and acceptance of the subcontracted organisation's procedures and their amendments. The controls used to fulfil this function should be clearly set out in the amendment section of the CAME detailing the level of CAMO involvement.

- 1.9. Whenever any elements of the continuing airworthiness management tasks are subcontracted, the CAMO personnel should have access to all relevant data in order to fulfil their responsibilities.

Note: The CAMO retains the authority to override, whenever necessary for the continuing airworthiness of their aircraft, any recommendation of the subcontracted organisation.

- 1.10. The CAMO should ensure that the subcontracted organisation continues to have qualified technical expertise and sufficient resources to perform the subcontracted tasks while complying with the relevant procedures. Failure to do so may invalidate the CAMO approval.

- 1.11. The contract should provide for competent authority monitoring.

- 1.12. The contract should address the respective responsibilities to ensure that any findings arising from the competent authority monitoring will be closed to the satisfaction of the competent authority.

2. Accomplishment

This paragraph describes the topics which may be applicable to such subcontracting arrangements.

- 2.1. Scope of work

The type of aircraft and their registrations, engine types and/or components subject to the continuing airworthiness management tasks contract should be specified.

- 2.2. Maintenance programme development and amendment

The CAMO may subcontract the preparation of the draft maintenance programme and any subsequent amendments. However, the CAMO remains responsible for assessing that the draft proposals meet its needs and for obtaining competent authority approval, where applicable; the relevant procedures should specify these responsibilities. The contract should also stipulate that any data necessary to substantiate the approval of the initial programme or an amendment to this programme should be provided for CAMO agreement and/or competent authority upon request.

- 2.3. Maintenance programme effectiveness and reliability

The CAMO should have a system in place to monitor and assess the effectiveness of the maintenance programme based on maintenance and operational experience. The collection of data and initial assessment may be made by the subcontracted organisation; the required actions are to be endorsed by the CAMO.

Where reliability monitoring is used to establish the effectiveness of the maintenance programme, this may be provided by the subcontracted organisation and should be specified in the relevant procedures. Reference should be made to the approved maintenance and reliability programme. Participation of the CAMO's personnel in reliability meetings with the subcontracted organisation should also be specified.

When providing reliability data, the subcontracted organisation is limited to working with primary data/documents provided by the CAMO or data provided by the CAMO's contracted maintenance organisation(s) from which the reports are derived. The pooling of reliability data is permitted if it is acceptable to the competent authority.

2.4. Permitted variations to the maintenance programme

The reasons and justification for any proposed variation to scheduled maintenance may be prepared by the subcontracted organisation. Acceptance of the proposed variation should be granted by the CAMO. The means by which the CAMO acceptance is given should be specified in the relevant procedures. When outside the limits set out in the maintenance programme, the CAMO is required to obtain approval by the competent authority.

2.5. Scheduled maintenance

Where the subcontracted organisation plans and defines maintenance checks or inspections in accordance with the approved maintenance programme, the required liaison with the CAMO, including feedback, should be defined.

The planning control and documentation should be specified in the appropriate supporting procedures. These procedures should typically set out the CAMO's level of involvement in each type of check. This will normally involve the CAMO assessing and agreeing to a work specification on a case-by-case basis for base maintenance checks. For routine line maintenance checks, this may be controlled on a day-to-day basis by the subcontracted organisation subject to appropriate liaison and CAMO controls to ensure timely compliance. This may typically include but is not necessarily limited to:

- applicable work package, including job cards;
- scheduled component removal list;
- ADs to be incorporated;
- modifications to be incorporated.

The associated procedures should ensure that the CAMO is informed in a timely manner on the accomplishment of such tasks.

2.6. Compliance monitoring and risk assessment

The CAMO's management system should monitor the adequacy of the subcontracted continuing airworthiness management task performance for compliance with the contract and with Part-CAMO and assess the risks entailed by such subcontracting. The terms of the contract should therefore include a provision allowing the CAMO to perform a surveillance (including audits and assessments) of the subcontracted organisation. The aim of the surveillance is primarily to investigate and judge the effectiveness of those subcontracted activities and thereby to ensure compliance with Part-CAMO and the contract and mitigate related safety risks. Audit and assessment reports may be subject to review when requested by the competent authority.

2.7. Access to the competent authority

The contract should specify that the subcontracted organisation should always grant access to the competent authority.

2.8. Maintenance data

The maintenance data used for the purpose of the contract should be specified, together with those responsible for providing such documentation and the competent authority responsible for the acceptance/approval of such data, when applicable. The CAMO should ensure that such data, including revisions, is readily available to the CAMO personnel and to those in the subcontracted organisation who may be required to assess such data. The CAMO should establish a 'fast track' means to ensure that urgent data is transmitted to the subcontractor in a timely manner. Maintenance data may include but is not necessarily limited to:

- the maintenance programme,
- airworthiness directives,
- service bulletins,
- repairs/modification data,
- aircraft maintenance manual,
- engine overhaul manual,
- aircraft illustrated parts catalogue (IPC),
- wiring diagrams,
- troubleshooting manual.

2.9. Airworthiness directives (ADs)

While the various aspects of AD assessment, planning and follow-up may be accomplished by the subcontracted organisation, AD embodiment is performed by a maintenance organisation. The CAMO is responsible for ensuring timely embodiment of the applicable ADs and is to be provided with notification of compliance. It, therefore, follows that the CAMO should have clear policies and procedures on AD embodiment supported by defined procedures which will ensure that the CAMO agrees to the proposed means of compliance.

The relevant procedures should specify:

- what information (e.g. AD publications, continuing airworthiness records, flight hours/cycles, etc.) the subcontracted organisation needs from the CAMO;
- what information (e.g. AD planning listing, detailed engineering order, etc.) the CAMO needs from the subcontracted organisation in order to ensure timely compliance with the ADs.

To fulfil the above responsibility, the CAMO should ensure that it receives current mandatory continued airworthiness information for the aircraft and equipment it is managing.

2.10. Service bulletin (SB) modifications

The subcontracted organisation may be required to review and make recommendations on the embodiment of an SB and other associated non-mandatory material based on a clear policy established by the CAMO. This should be specified in the contract.

2.11. Mandatory life limitation or scheduled maintenance controls and component control/removal forecast

Where the subcontracted organisation performs planning activities, it should be specified that the organisation should receive the current flight cycles, flight hours, landings and/or calendar controlled details, as applicable, at a frequency to be specified in the contract. The frequency

should be such that it allows the organisation to properly perform the subcontracted planning functions. It, therefore, follows that there will need to be adequate liaison between the CAMO, the contracted maintenance organisation(s) and the subcontracted organisation. Additionally, the contract should specify how the CAMO will be in possession of all current flight cycles, flight hours, etc., so that it may assure the timely accomplishment of the required maintenance.

2.12. Engine health monitoring

If the CAMO subcontracts the on-wing engine health monitoring, the subcontracted organisation should receive all the relevant information to perform this task, including any parameter reading deemed necessary to be supplied by the CAMO for this control. The contract should also specify what kind of feedback information (such as engine limitation, appropriate technical advice, etc.) the organisation should provide to the CAMO.

2.13. Defect control

Where the CAMO has subcontracted the day-to-day control of technical log deferred defects, this should be specified in the contract and should be adequately described in the appropriate procedures. The operator's MEL/CDL provides the basis for establishing which defects may be deferred and the associated limits. The procedures should also define the responsibilities and actions to be taken for defects such as AOG situations, repetitive defects, and damage beyond the type certificate holder's limits.

For all other defects identified during maintenance, the information should be brought to the attention of the CAMO which, depending upon the procedural authority granted by the competent authority, may determine that some defects can be deferred. Therefore, adequate liaison between the CAMO, its subcontracted organisation and contracted maintenance organisation should be ensured.

The subcontracted organisation should make a positive assessment of potential deferred defects and consider the potential hazards arising from the cumulative effect of any combination of defects. The subcontracted organisations should liaise with the CAMO to get its agreement following this assessment.

Deferment of MEL/CDL allowable defects can be accomplished by a contracted maintenance organisation in compliance with the relevant technical log procedures, subject to the acceptance by the aircraft commander.

2.14. Occurrence reporting

All incidents and safety occurrences should be collected, and those that meet the reporting criteria should be reported as required by point CAMO.A.160 in accordance with a procedure established by the CAMO (see GM1 CAMO.A.205).

2.15. Continuing airworthiness records

They may be maintained and kept by the subcontracted organisation on behalf of the CAMO, which remains the owner of these documents. However, the CAMO should be provided with the current status of AD compliance and life limited parts and time controlled components in accordance with the agreed procedures. The CAMO should also be granted unrestricted and timely access to the original records as and when needed. Online access to the appropriate information systems is acceptable.

The record-keeping requirements of point CAMO.A.220 should be met. Access to the records by duly authorised members of the competent authority should be granted upon request.

2.16. Maintenance check flight (MCF) procedures

MCFs are performed under the control of the operator in coordination with the CAMO. MCF requirements from the subcontracted organisation or contracted maintenance organisation should be agreed by the operator/CAMO.

2.17. Communication between the CAMO and the subcontracted organisation

2.17.1. In order to fulfil its airworthiness responsibility, the CAMO needs to receive all the relevant reports and relevant maintenance data. The contract should specify what information should be provided and when.

2.17.2. Meetings provide one important cornerstone whereby the CAMO can fulfil part of its responsibility for ensuring the airworthiness of the operated aircraft. They should be used to establish good communication between the CAMO, the subcontracted organisation and the contracted maintenance organisation. The terms of the contract should include, whenever appropriate, the provision for a certain number of meetings to be held between the involved parties. Details of the types of liaison meetings and associated terms of reference of each meeting should be documented. The meetings may include but are not limited to all or a combination of:

(a) Contract review

Before the contract is enforced, it is very important that the technical personnel of both parties, that are involved in the fulfilment of the contract, meet in order to be sure that every point leads to a common understanding of the duties of both parties.

(b) Work scope planning meeting

Work scope planning meetings may be organised so that the tasks to be performed are commonly agreed.

(c) Technical meeting

Scheduled meetings should be organised in order to review on a regular basis and agree on actions on technical matters such as ADs, SBs, future modifications, major defects found during shop visit, reliability, etc.

(d) Compliance and performance meeting

Compliance and performance meetings should be organised in order to examine matters raised by the CAMO's surveillance and the competent authority's oversight activity and to agree on necessary preventive, corrective and risk mitigation actions.

(e) Reliability meeting

When a reliability programme exists, the contract should specify the involvement of the CAMO and of the subcontracted organisation in that programme, including their participation in reliability meetings. Provision to enable competent authority participation in the periodical reliability meetings should also be made.

Appendix III to AMC4 CAMO.A.305(g) — Fuel Tank Safety training

The provisions of Appendix XII to AMC1 M.B.102(c) apply.

Appendix IV to AMC1 CAMO.A.315(c) — Contracted maintenance

1. Maintenance contracts

The following paragraphs are not intended to provide a standard maintenance contract, but to provide a list of the main points that should be addressed, when applicable, in a maintenance contract between the CAMO and the maintenance organisation. The following paragraphs only address technical matters and exclude matters such as costs, delay, warranty, etc.

When maintenance is contracted to more than one maintenance organisation (for example, aircraft base maintenance to X, engine maintenance to Y, and line maintenance to Z1, Z2 and Z3), attention should be paid to the consistency of the different maintenance contracts.

A maintenance contract is not normally intended to provide appropriate detailed work instructions to personnel. Accordingly, there should be established organisational roles and responsibilities, procedures and routines in the CAMO and the maintenance organisation to cover these functions in a satisfactory way such that any person involved is informed about his/her accountabilities, responsibilities and the procedures that apply. These procedures and routines can be included/appended to the CAME and to the maintenance organisation's manual/MOE, or can consist in separate procedures. In other words, procedures and routines should reflect the conditions of the contract.

2. Aircraft/engine maintenance

The following subparagraphs may be adapted to a maintenance contract that applies to aircraft base maintenance, aircraft line maintenance, and engine maintenance.

Aircraft maintenance also includes the maintenance of the engines and APU while they are installed on the aircraft.

2.1. Scope of work

The type of maintenance to be performed by the maintenance organisation should be specified unambiguously. In case of line and/or base maintenance, the contract should specify the aircraft type and, preferably, should include the aircraft's registrations.

In case of engine maintenance, the contract should specify the engine type.

2.2. Locations identified for the performance of maintenance/certificates held

The place(s) where base, line or engine maintenance, as applicable, will be performed should be specified. The certificate held by the maintenance organisation at the place(s) where maintenance will be performed should be referred to in the contract. If necessary, the contract may address the possibility of performing maintenance at any location subject to the need for such maintenance arising either from the unserviceability of the aircraft or from the necessity to support occasional line maintenance.

2.3. Subcontracting

The maintenance contract should specify under which conditions the maintenance organisation may subcontract tasks to a third party (regardless if this third party is approved or not). At least the contract should make reference to M.A.615, CAO.A.095(a)(2) and 145.A.75(b). Additional

guidance is provided by the associated AMC/GM. In addition, the CAMO may require the maintenance organisation to obtain the CAMO approval before subcontracting to a third party. Access should be given to the CAMO to any information (especially the compliance monitoring information) about the maintenance organisation's subcontractors involved in the contract. It should, however, be noted that under the CAMO responsibility both the CAMO and its competent authority are entitled to be fully informed about subcontracting, although the competent authority will normally only be concerned with aircraft, engine and APU subcontracting.

2.4. Maintenance programme

The maintenance programme, under which maintenance has to be performed, has to be specified.

The CAMO should have that maintenance programme approved by its competent authority.

2.5. Monitoring

The terms of the contract should include a provision allowing the organisation to monitor the maintenance organisation in terms of compliance with the applicable requirements. The maintenance contract should specify how the results of such monitoring are taken into account by the maintenance organisation (See also paragraph 2.23. 'Meetings').

2.6. Competent authority involvement

The contract should identify the competent authority(ies) responsible for the oversight of the aircraft, the operator, the CAMO, and the maintenance organisation. Additionally, the contract should allow competent authority(ies) access to the maintenance organisation.

2.7. Maintenance data

The contract should specify the maintenance data and any other manual required for the fulfilment of the contract, and how these data and manuals are made available and kept current (regardless if they are provided by the CAMO or by the maintenance organisation).

This may include but is not limited to:

- maintenance programme,
- airworthiness directives,
- repairs/modification data,
- aircraft maintenance manual,
- aircraft illustrated parts catalogue (IPC),
- wiring diagrams,
- troubleshooting manual,
- Minimum Equipment List (normally on board the aircraft),
- operator's manual,
- flight manual,
- engine maintenance manual,
- engine overhaul manual.

2.8. Incoming conditions

The contract should specify in which condition the aircraft should be made available to the maintenance organisation. For extensive maintenance, it may be beneficial that a work scope planning meeting be organised so that the tasks to be performed may be commonly agreed (see also paragraph 2.23 'Meetings').

2.9. Airworthiness directives and service bulletins/modifications

The contract should specify the information that the CAMO is responsible to provide to the maintenance organisation, such as:

- the status of the ADs including due date and the selected means of compliance, if applicable; and
- status of modifications and the decision to embody a modification or an SB.

In addition, the contract should specify the type of information the CAMO will need in return to complete the control of ADs and modification status.

2.10. Hours and cycles control

Hours and cycles control is the responsibility of the CAMO, and the contract should specify how the CAMO should provide the current hours and cycles to the maintenance organisation and whether the maintenance organisation should receive the current flight hours and cycles on a regular basis so that it may update the records for its own planning functions (see also paragraph 2.22 'Exchange of information').

2.11. Life limited parts and time controlled components

The control of life limited parts and time controlled components is the responsibility of the CAMO. The contract should specify whether the CAMO should provide the status of life limited parts and time controlled components to the maintenance organisation, and the information that the approved organisation will have to provide to the CAMO about the removal/installation of the life limited parts and time controlled components so that the CAMO may update its records (see also paragraph 2.22 'Exchange of information').

2.12. Supply of parts

The contract should specify whether a particular type of material or component is supplied by the CAMO or by the maintenance organisation, which type of component is pooled, etc. The contract should clearly state that it is the maintenance organisation's responsibility to be satisfied that the component in question meets the approved data/standard and to ensure that the aircraft component is in a satisfactory condition for installation. Additional guidance on the acceptance of components is provided in M.A.501, ML.A.501 and 145.A.42.

2.13. Pooled parts at line stations

If applicable, the contract should specify how the subject of pooled parts at line stations should be addressed.

2.14. Scheduled maintenance

For planning scheduled maintenance checks, the support documentation to be given to the maintenance organisation should be specified. This may include but is not limited to:

- applicable work package, including job cards;
- scheduled component removal list;

- modifications to be incorporated.

When the maintenance organisation determines, for any reason, to defer a maintenance task, it has to be formally agreed with the CAMO. If the deferment goes beyond an approved limit, please refer to paragraph 2.17 'Deviation from the maintenance schedule'. This should be addressed, where applicable, in the maintenance contract.

2.15. Unscheduled maintenance/defect rectification

The contract should specify to which level the maintenance organisation may rectify a defect without reference to the CAMO. It should describe, as a minimum, the management of approval of repairs and the incorporation of repairs. The deferment of any defect rectification should be submitted to the CAMO.

2.16. Deferred tasks

See paragraphs 2.14 and 2.15 above, as well as 145.A.50(e), M.A.801(f) and ML.A.801(f). In addition, for aircraft line and base maintenance, the use of the operator's MEL and the liaison with the CAMO in case of a defect that cannot be rectified at the line station should be addressed.

2.17. Deviation from the maintenance schedule

Deviations from the maintenance schedule have to be managed by the CAMO in accordance with the procedures established in the maintenance programme. The contract should specify the support the maintenance organisation may provide to the operator in order to substantiate the deviation request.

2.18. Maintenance check flight (MCF)

If any MCF is required after aircraft maintenance, it should be performed in accordance with the procedures established in the CAME and/or the operator's manual.

2.19. Bench test

The contract should specify the acceptability criterion and whether a representative of the CAMO should witness an engine undergoing test.

2.20. Release to service documentation

The release to service has to be performed by the maintenance organisation in accordance with its maintenance organisation procedures. The contract should, however, specify which support forms have to be used (aircraft technical log, maintenance organisation's release format, etc.) and the documentation that the maintenance organisation should provide to the CAMO upon delivery of the aircraft. This may include but is not limited to:

- certificate of release to service,
- flight test report,
- list of modifications embodied,
- list of repairs,
- list of ADs accomplished,
- maintenance visit report,
- test bench report.

2.21. Maintenance record-keeping

The CAMO may subcontract the maintenance organisation to retain some of the maintenance records required by Part-M Subpart C. This means that the CAMO subcontracts under its management system part of its record-keeping tasks and, therefore, the provisions of point CAMO.A.125(d)(3) apply.

2.22. Exchange of information

Each time exchange of information between the CAMO and the maintenance organisation is necessary, the contract should specify what information should be provided and when (i.e. in which case or at what frequency), how, by whom and to whom it has to be transmitted.

2.23. Meetings

The maintenance contract should include the provision for a certain number of meetings to be held between the CAMO and the maintenance organisation.

2.23.1. Contract review

Before the contract is enforced, it is very important that the technical personnel of both parties, that are involved in the fulfilment of the contract, meet in order to be sure that every point leads to a common understanding of the duties of both parties

2.23.2. Work scope planning meeting

Work scope planning meetings may be organised so that the tasks to be performed may be commonly agreed.

2.23.3. Technical meeting

Scheduled meetings may be organised in order to review on a regular basis technical matters such as ADs, SBs, future modifications, major defects found during maintenance check, aircraft and component reliability, etc.

2.23.4. Compliance and performance meeting

Compliance and performance meetings may be organised in order to examine matters raised by the CAMO's monitoring and to agree upon necessary preventive and corrective actions.

2.23.5. Reliability meeting

When a reliability programme exists, the contract should specify the CAMO's and maintenance organisation's respective involvement in that programme, including the participation in reliability meetings.

Appendix V to AMC2 CAMO.B.310(c) — EASA Form 13-CAMO

PART-CAMO APPROVAL RECOMMENDATION REPORT		EASA FORM 13-CAMO
Part 1: General		
Name of organisation:		
Approval reference:		
Requested approval rating/		
EASA Form 14 or AOC dated*:		
Other approvals held (if app.)		
Address of facility(ies) audited:		
Audit period: from		to
Date(s) of audit(s):		
Audit reference(s):		
Persons interviewed:		Signature(s):
Competent authority inspector(s):		Signature(s):
Competent authority office:		Date of EASA Form 13-CAMO Part 1 completion:
*delete as appropriate		

PART-CAMO APPROVAL RECOMMENDATION REPORT		EASA FORM 13-CAMO				
Part 2: Part-CAMO Compliance Audit Review						
Para	Subject					
CAMO.A.115	Application for an organisation certificate	<input type="checkbox"/>				
CAMO.A.120	Means of compliance	<input type="checkbox"/>				
CAMO.A.125	Terms of approval and privileges	<input type="checkbox"/>				
CAMO.A.130	Changes to the organisation	<input type="checkbox"/>				
CAMO.A.135	Continued validity	<input type="checkbox"/>				
CAMO.A.140	Access	<input type="checkbox"/>				
CAMO.A.150	Findings	<input type="checkbox"/>				
CAMO.A.155	Immediate reaction to a safety problem	<input type="checkbox"/>				
CAMO.A.160	Occurrence reporting	<input type="checkbox"/>				
CAMO.A.200	Management system	<input type="checkbox"/>				
CAMO.A.202	Internal safety reporting scheme	<input type="checkbox"/>				
CAMO.A.205	Contracting and subcontracting	<input type="checkbox"/>				
CAMO.A.215	Facilities	<input type="checkbox"/>				
CAMO.A.220	Record-keeping	<input type="checkbox"/>				
CAMO.A.300	Continuing airworthiness management exposition	<input type="checkbox"/>				
CAMO.A.305	Personnel requirements	<input type="checkbox"/>				
CAMO.A.310	Airworthiness review staff qualifications	<input type="checkbox"/>				
CAMO.A.315	Continuing airworthiness management	<input type="checkbox"/>				
CAMO.A.320	Airworthiness review	<input type="checkbox"/>				

CAMO.A.325 Continuing airworthiness
management data

Competent authority inspector(s):

Signature(s):

Competent authority office:

Date of EASA Form 13-CAMO Part 2 completion:

DRAFT

PART-CAMO APPROVAL RECOMMENDATION REPORT		EASA FORM 13-CAMO
Part 3: Compliance with PART-CAMO continuing airworthiness management exposition (CAME)		
Please either tick (✓) the box if satisfied with compliance; or cross (x) if not satisfied with compliance and specify the reference of the Part 4 finding; or enter N/A where an item is not applicable; or N/R when applicable but not reviewed.		
PART 0	General organisation, safety policy and objectives	
0.1	<input type="checkbox"/>	Safety policy, objectives and accountable manager statement
0.2	<input type="checkbox"/>	General information and scope of work
0.3	<input type="checkbox"/>	Management personnel
0.4	<input type="checkbox"/>	Management organisation chart
0.5	<input type="checkbox"/>	Procedure for changes requiring prior approval
0.6	<input type="checkbox"/>	Procedure for changes not requiring prior approval
0.7	<input type="checkbox"/>	Alternative means of compliance procedure (AltMoC)
PART 1	Continuing airworthiness management procedures	
1.1	<input type="checkbox"/>	Use of aircraft continuing airworthiness record system and if applicable, aircraft technical log (ATL) system
1.1a	<input type="checkbox"/>	MEL application
1.2	<input type="checkbox"/>	Aircraft maintenance programmes(AMP) – development amendment and approval
1.3	<input type="checkbox"/>	Continuing airworthiness records, responsibilities, retention, access
1.4	<input type="checkbox"/>	Accomplishment and control of airworthiness directives
1.5	<input type="checkbox"/>	Analysis of the effectiveness of the maintenance programme(s)
1.6	<input type="checkbox"/>	Non-mandatory modification and inspections
1.7	<input type="checkbox"/>	Repairs and modifications
1.8	<input type="checkbox"/>	Defect reports
1.9	<input type="checkbox"/>	Engineering activity
1.10	<input type="checkbox"/>	Reliability programmes
1.11	<input type="checkbox"/>	Pre-flight inspections
1.12	<input type="checkbox"/>	Aircraft weighing
1.13	<input type="checkbox"/>	Maintenance check flight procedures
PART 2	Management system procedures	
2.1	<input type="checkbox"/>	Hazard identification and safety risk management schemes
2.2	<input type="checkbox"/>	Internal safety reporting and investigations
2.3	<input type="checkbox"/>	Safety action planning
2.4	<input type="checkbox"/>	Safety performance monitoring
2.5	<input type="checkbox"/>	Change management of change

2.6	<input type="checkbox"/> Safety training and promotion
2.7	<input type="checkbox"/> Immediate safety action and coordination with operator's emergency response plan (ERP)
2.8	<input type="checkbox"/> Compliance monitoring
2.8.1	<input type="checkbox"/> Audit plan and audits procedure
2.8.2	<input type="checkbox"/> Monitoring of continuing airworthiness management activities
2.8.3	<input type="checkbox"/> Monitoring of the effectiveness of the maintenance programme(s)
2.8.4	<input type="checkbox"/> Monitoring that all maintenance is carried out by an appropriate maintenance organisation
2.8.5	<input type="checkbox"/> Monitoring that all contracted maintenance is carried out in accordance with the contract, including subcontractors used by the maintenance contractor
2.8.6	<input type="checkbox"/> Compliance monitoring personnel
2.9	<input type="checkbox"/> Control of personnel competency
2.10	<input type="checkbox"/> Management system record-keeping
2.11	<input type="checkbox"/> Occurrence reporting
PART 3	<input type="checkbox"/> Contracted Maintenance — management of maintenance
3.1	<input type="checkbox"/> Procedures for contracted maintenance
3.2	<input type="checkbox"/> Product audit of aircraft
PART 4	<input type="checkbox"/> Airworthiness review procedures
4.1	<input type="checkbox"/> Airworthiness review staff
4.2	<input type="checkbox"/> Documented review of aircraft records
4.3	<input type="checkbox"/> Physical survey
4.4	<input type="checkbox"/> Additional procedures for recommendations to competent authorities for the import of aircraft
4.5	<input type="checkbox"/> Recommendations to competent authorities
4.6	<input type="checkbox"/> Issue of ARC
4.7	<input type="checkbox"/> Airworthiness review records, responsibilities, retention and access
4.8	<input type="checkbox"/> ARC extension
PART 4B	<input type="checkbox"/> Permit to fly procedures
4B.1	<input type="checkbox"/> Conformity with approved flight conditions
4B.2	<input type="checkbox"/> Issue of permit to fly under the CAMO privilege
4B.3	<input type="checkbox"/> Permit to fly authorised signatories
4B.4	<input type="checkbox"/> Interface with the local authority for the flight
4B.5	<input type="checkbox"/> Permit to fly records, responsibilities, retention and access
PART 5	<input type="checkbox"/> Supporting documents
5.1	<input type="checkbox"/> Sample Documents, including the template of the ATL system

5.2	<input type="text"/> List of airworthiness review staff
5.3	<input type="text"/> List of subcontractors as per CAMO.A.125(d)(3)
5.4	<input type="text"/> List of contracted maintenance organisations and list of maintenance contracts as per CAMO.A.300(a)(13)
5.5	<input type="text"/> Copy of contracts for subcontracted work (Appendix II to AMC1 CAMO.A.125(d)(3))
5.6	<input type="text"/> List of approved maintenance programmes as per CAMO.A.300(a)(12)
5.7	<input type="text"/> List of currently approved alternative means of compliance as per point CAMO.A.300(a)(13)

CAME Reference:

CAME Amendment:

Competent authority inspector(s):

Signature(s):

Competent authority office:

Date of EASA Form 13-CAMO Part 3 completion:

DRAFT

PART-CAMO APPROVAL RECOMMENDATION REPORT		EASA FORM 13-CAMO		
Part 2 or 3 ref.	Audit reference(s): Findings	L e v e l	Corrective action	
			Date Due	Date Closed

DRAFT

PART-CAMO APPROVAL RECOMMENDATION REPORT		EASA FORM 13-CAMO
Part 5: PART-CAMO approval or continued approval or change recommendation*		
Name of organisation:		
Approval reference:		
Audit reference(s):		
The following Part-CAMO terms of approval are recommended for this organisation:		
Or, it is recommended that the Part-CAMO terms of approval specified in EASA Form 14 referenced be continued.		
Name of recommending competent authority inspector:		
Signature of recommending competent authority inspector:		
Competent authority office:		
Date of recommendation:		
EASA Form 13-CAMO review:	Date:	
*delete as appropriate		