

# **Acceptable Means of Compliance (AMC) and Guidance Material (GM) to Annex Vd (Part-CAO) to Commission Regulation (EU) No 1321/2014**

Issue 1

13 March 2020<sup>1</sup>

---

<sup>1</sup> For the date of entry into force of this issue, kindly refer to Decision 2020/002/R in the [Official Publication](#) of the Agency.

## TABLE OF CONTENTS

<b>Section A — Organisation Requirements .....</b>	<b>4</b>
AMC1 CAO.A.015 Application.....	4
GM1 CAO.A.020 Terms of approval .....	4
SCOPE OF WORK — AIRCRAFT CLASS .....	4
GM1 CAO.A.020(a) Terms of approval .....	5
EXAMPLES OF CHANGE TO THE SCOPE OF WORK.....	5
AMC1 CAO.A.020(c) Terms of approval .....	5
FABRICATION .....	5
AMC1 CAO.A.025 Combined airworthiness exposition (CAE) .....	6
AMC2 CAO.A.025 Combined airworthiness exposition (CAE) .....	9
AMC1 CAO.A.030 Facilities.....	9
FACILITIES FOR AN ORGANISATION HOLDING MAINTENANCE PRIVILEGES.....	9
AMC1 CAO.A.035(c) Personnel requirements.....	10
KNOWLEDGE, BACKGROUND AND EXPERIENCE OF NOMINATED PERSON(S).....	10
AMC1 CAO.A.035(e) Personnel requirements .....	11
QUALIFICATION ASSESSMENT .....	11
AMC1 CAO.A.045 Airworthiness review staff .....	11
AMC1 CAO.A.050(a) Components, equipment and tools .....	12
AMC1 CAO.A.055 Maintenance data and work orders.....	12
AMC1 CAO.A.060(g) Maintenance standards .....	12
AMC1 CAO.A.060(h) Maintenance standards .....	13
CRITICAL MAINTENANCE TASKS .....	13
AMC2 CAO.A.060(h) Maintenance standards .....	13
INDEPENDENT INSPECTION .....	13
GM1 CAO.A.070 Component certificate of release to service .....	15
COMPONENTS MAINTAINED BY A CAO.....	15
AMC1 CAO.A.070(a) Component certificate of release to service.....	15
AMC1 CAO.A.075 Continuing airworthiness management.....	20
AMC1 CAO.A.080 Continuing airworthiness management data.....	20
GM1 CAO.A.095 Privileges of the organisation.....	20
AMC1 CAO.A.095(b)(3) Privileges of the organisation .....	21
SUBCONTRACTING OF CONTINUING AIRWORTHINESS TASKS.....	21
GM1 CAO.A.100(a) Quality system and organisational review .....	22
QUALITY SYSTEM — GENERAL.....	22
AMC1 CAO.A.100(a) Quality system and organisational review .....	22
QUALITY SYSTEM — FEEDBACK .....	22
GM1 CAO.A.100(e) Quality system and organisational review.....	23
AMC1 CAO.A.100(f) Quality system and organisational review.....	23
ORGANISATIONAL REVIEW .....	23
<b>Section B — Authority Requirements.....</b>	<b>25</b>
GM1 CAO.B.017 Means of compliance .....	25
ALTERNATIVE MEANS OF COMPLIANCE .....	25
GM1 CAO.B.045(a) Initial certification procedure .....	25

---

FORMAL ACCEPTANCE OF MANAGEMENT STAFF .....	25
AMC1 CAO.B.045 Initial certification procedure .....	25
VERIFICATION OF COMPLIANCE .....	25
AMC2 CAO.B.045 Initial certification procedure .....	26
MAINTENANCE DATA.....	26
AMC1 CAO.B.045(c) Initial certification procedure .....	26
AMC1 CAO.B.055 Continuing oversight .....	26
AMC2 CAO.B.055 Continuing oversight .....	26
SUBCONTRACTED ACTIVITIES .....	26
AMC1 CAO.B.060(a)(1) Findings.....	27
LEVEL 1 FINDINGS .....	27
<b>Appendices to AMC and GM to Part-CAO.....</b>	<b>28</b>
Appendix I to AMC1 CAO.B.045(c) and AMC1 CAO.B.055 — EASA Form 613 .....	28
Appendix II to AMC1 CAO.A.100(f) — Organisational review .....	35
Appendix III to AMC1 CAO.A.015 — EASA Form 2 .....	40

## SECTION A — ORGANISATION REQUIREMENTS

### AMC1 CAO.A.015 Application

An application should be made on an EASA Form 2 (Appendix III to AMC1 CAO.A.015) or an equivalent form that is acceptable to the competent authority.

Draft documents should be submitted at the earliest opportunity so that the 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.

### GM1 CAO.A.020 Terms of approval

#### SCOPE OF WORK — AIRCRAFT CLASS

In the combined airworthiness exposition (CAE), the following guidance can be used as a minimum aircraft information to be indicated while specifying the scope of work of an organisation in the aircraft class.

- (a) For aeroplanes above 2 730 kg maximum take-off mass (MTOM):  
The particular aircraft types included (the use of the list of type ratings contained in the AMC to Part-66 is acceptable).
- (b) For aeroplanes up to 2 730 kg MTOM:
  - The type of propulsion (turbine engine, piston engine)
  - The category (ELA1, ELA2, up to 2 730 kg)
- (c) For helicopters above 1 200 kg MTOM and four occupants:  
The particular aircraft types included (the use of the list of type ratings contained in Appendix I to AMC to Part-66 is acceptable).
- (d) For helicopters up to 1 200 kg MTOM and four occupants:  
The type of propulsion (turbine engine, piston engine)
- (e) For sailplanes:  
ELA1
- (f) For balloons:
  - Hot-air balloons
  - Gas-balloons
  - Roziere balloons

- (g) For airships:
- The particular airship type for those which are not classified as ELA2
  - For ELA2 airships, whether it covers hot-air airships or gas-airships

Each category or type of aircraft specified in the scope of work is to be completed with the privileges held (maintenance, continuing airworthiness management, airworthiness review, permit to fly) for that aircraft category or type.

## GM1 CAO.A.020(a) Terms of approval

### EXAMPLES OF CHANGE TO THE SCOPE OF WORK

In the case of helicopter Bell 206B model (above 1 200 kg MTOM) with regard to the scope of work, adding Bell 206L model to the scope of work would require approval by the competent authority in accordance with point CAO.A.020(a)(1).

If the scope of work contains the Rotax 912 A Series complete piston engine, the combined airworthiness organisation (CAO) shall control changes to the scope of work for additional complete piston engines (e.g. Rotax 914 series or LOM M 332 Series) in accordance with CAO.A.105(b) through an approved procedure.

## AMC1 CAO.A.020(c) Terms of approval

### FABRICATION

- (a) The agreement by the competent authority for the fabrication of parts by the maintenance organisation should be formalised through the approval of a detailed procedure in the CAE. This AMC contains principles and conditions to be taken into account for the preparation of an acceptable procedure.
- (b) Fabrication, inspection, assembly and test should be clearly within the technical and procedural capability of the approved maintenance organisation.
- (c) The approved data necessary to fabricate the part is that approved by either the Agency, the type certificate (TC) holder, the Part 21 design organisation approval holder, or the supplemental type certificate (STC) holder.
- (d) Items fabricated by an approved maintenance organisation may only be used by that organisation in the course of overhaul, maintenance, modifications, or repair of aircraft or components undergoing work within its own facilities. The permission to fabricate does not constitute approval for manufacturing, or for supplying externally and the parts do not qualify for certification on EASA Form 1. This also applies to the bulk transfer or surplus inventory, in that locally fabricated parts are physically segregated and excluded from any delivery certification.
- (e) Fabrication of parts, modification kits, etc. for onward supply and/or sale may not be conducted under a CAO approval.

- (f) The data specified in point (c) may include repair procedures involving the fabrication of parts. Where the data on such parts is sufficient to facilitate fabrication, the parts may be fabricated by an approved maintenance organisation. Care should be taken to ensure that the data includes details on part numbering, dimensions, materials, processes, and any special manufacturing techniques, special raw material specification or/and incoming inspection requirement and that the approved organisation has the necessary capability. That capability should be defined within the CAE. Where special processes or inspection procedures are defined in the approved data, which are not available at the approved maintenance organisation, that organisation cannot fabricate the part unless the TC/STC holder gives an approved alternative.
- (g) Examples of fabrication under the scope of a CAO approval can include but are not limited to the following:
- (1) fabrication of bushes, sleeves and shims;
  - (2) fabrication of secondary structural elements and skin panels;
  - (3) fabrication of control cables;
  - (4) fabrication of flexible and rigid pipes;
  - (5) fabrication of electrical cable looms and assemblies; and
  - (6) formed or machined sheet metal panels for repairs.

It is not acceptable to fabricate any item to pattern unless an engineering drawing of the item is produced which includes any necessary fabrication processes and which is accepted to the competent authority.

- (h) Where a TC holder or an approved production organisation is prepared to make available complete data which is not referred to in aircraft manuals or service bulletins, but provides manufacturing drawings for items specified in parts lists, the fabrication of these items is not considered to be within the scope of a CAO approval unless agreed otherwise by the competent authority in accordance with a procedure specified in the CAE.

- (i) Inspection and identification

Any locally fabricated part should be subject to an inspection stage before, separately, and preferably independently from, any inspection of its installation. The inspection should establish full compliance with the relevant manufacturing data, and the part should be unambiguously identified as fit for use by stating conformity to the approved data. Adequate records should be maintained of all such fabrication processes including heat treatment and the final inspections. All parts, except those with inadequate space, should carry a part number which clearly relates them to the manufacturing/inspection data. Additionally to the part number, the approved maintenance organisation's identity should be marked on the part for traceability purposes.

## AMC1 CAO.A.025 Combined airworthiness exposition (CAE)

This AMC provides an outline of the layout of an acceptable CAE.

Chapter	Description	Implementing rule reference
<b>PART A — GENERAL DESCRIPTION</b>		
A.1	Statement by accountable manager	CAO.A.025(a)(1); CAO.A.035(a)
A.2	General presentation of the organisation	CAO.A.035(a); CAO.A.100(e)
A.3	Description and location of the facilities	CAO.A.025(a)(9); CAO.A.030
A.4	Scope of work	CAO.A.020(a); CAO.A.025(a)(2); CAO.A.095(e); Appendix I point (a)
A.5	Exposition amendments and changes to the organisation	CAO.A.025(a)(11)/(c); CAO.A.105
A.6	Procedure for alternative means of compliance	CAO.A.017
A.7	Management personnel	CAO.A.025(a)(3); CAO.A.035(b); CAO.A.100(a)
A.8	Organisation chart	CAO.A.025(a)(4)
A.9	Manpower resources	CAO.A.035(d)
A.10	List of certifying staff	CAO.A.025(a)(5)
A.11	List of staff responsible for the development and approval of the aircraft maintenance programme (AMP)	CAO.A.025(a)(6)
A.12	List of airworthiness review staff	CAO.A.025(a)(7); CAO.A.045(d)
A.13	List of staff responsible for the issuance of permits to fly	CAO.A.025(a)(8)
<b>PART B — GENERAL PROCEDURES</b>		
B.1	Quality (or organisational review) system	CAO.A.100(a)/(b)/(d)/(e)/(f)
B.2	Audit plan (or frequency and content of organisational review)	CAO.A.100(b)/(f)
B.3	Monitoring of maintenance contracts	CAO.A.100(b)(2)
B.4	Qualification, assessment and training of staff	CAO.A.035(c)/(d)/(e)/(f); CAO.A.040(a); CAO.A.045(a)/(b)/(c); CAO.A.060(a)
B.5	One-off certification authorisation	CAO.A.040(b)
B.6	Limited certification authorisation	CAO.A.040(c)
B.7	Subcontracting	CAO.A.095(a)(2)/(b)(3); CAO.A.100(f)
B.8	Maintenance data and continuing airworthiness management data	CAO.A.055(a); CAO.A.080
B.9	Records management and retention	CAO.A.035(e); CAO.A.040(d); CAO.A.045(e); CAO.A.050(b); CAO.A.060(j); CAO.A.075(a)/(b)(9); CAO.A.090; CAO.A.100(c); CAO.A.085
B.10	Carrying out the airworthiness review	CAO.A.085; CAO.A.095(c)
B.11	Conformity with approved flight conditions	CAO.A.095(d)
B.12	Issue of the permit to fly	CAO.A.095(d); CAO.A.045(a)
<b>PART C — MAINTENANCE PROCEDURES</b>		
C.1	Maintenance — general	CAO.A.025(10)
C.2	Work order acceptance	CAO.A.055(b)
C.3	Components, equipment, tools and material (supply, acceptance, segregation, storage, calibration, etc.)	CAO.A.050; CAO.A.060(d); CAO.A.030(b)
C.4	Maintenance facility (selection, organisation, cleanliness and environmental limitations)	CAO.A.060(b)/(e)/(f)

Chapter	Description	Implementing rule reference
C.5	Maintenance accomplishment and maintenance standards	CAO.A.095(a)(1); CAO.A.060(c); Appendix I points (b)/(c)/(d)
C.6	Prevention of maintenance error	CAO.A.060(g)/(i)
C.7	Critical maintenance tasks and error-capturing method	CAO.A.060(h)
C.8	Fabrication	CAO.A.020(c)
C.9	Certifying staff responsibilities and maintenance release	CAO.A.040(a); CAO.A.065; CAO.A.070; CAO.A.095(a)(4)
C.10	Defects arising during maintenance	CAO.A.075(b)(6)
C.11	Maintenance away from approved location	CAO.A.095(a)(3)
C.12	Procedure for component maintenance under aircraft or engine rating	Appendix I point (b)/(c)
C.13	Procedure for maintenance on installed engine (or component) under engine (or component) rating	Appendix I point (c)/(d)
C.14	Special procedures (specialised tasks, non-destructive testing (NDT), engine running, etc.)	CAO.A.030(a); Appendix I point (e)
C.15	Issue of airworthiness review certificate (ARC) under maintenance privilege	CAO.A.095(c)(2)
<b>PART D — CONTINUING AIRWORTHINESS MANAGEMENT PROCEDURES</b>		
D.1	Continuing airworthiness management — general	CAO.A.025(10); CAO.A.095(b)(1); CAO.A.075(a)/(b)(7)/(b)(9)
D.2	Minimum equipment list (MEL) (and configuration deviation list (CDL)) application	CAO.A.075(a)
D.3	AMP development, control and periodic review	CAO.A.075(a)/(b)(1)/(b)(2); CAO.A.095(b)(2)
D.4	Airworthiness directives and other mandatory airworthiness requirements	CAO.A.075(a)/(b)(5)/(b)(8)
D.5	Modifications and repairs	CAO.A.075(b)(3)
D.6	Pre-flight inspection	CAO.A.075(a)
D.7	Defects	CAO.A.075(b)(6)
D.8	Establishment of contracts and work orders for the maintenance	CAO.A.075(a)/(b)(4)/(b)(7)
D.9	Coordination of maintenance activities	CAO.A.075(b)(8)
D.10	Mass and balance statement	CAO.A.075(a)/(b)(10)
D.11	Issue of ARC or ARC recommendation	CAO.A.095(c)(1)(i)
D.12	ARC extension	CAO.A.095(b)(4)/(c)(1)(ii)
D.13	Maintenance check flights	CAO.A.075(a)
<b>PART E — SUPPORTING DOCUMENTS</b>		
E.1	Sample documents	
E.2	List of subcontracted organisations	
E.3	List of organisations contracted by the CAO	
E.4	Aircraft technical log system (if applicable)	
E.5	List of the currently approved alternative means of compliance	
E.6	Copy of contracts for subcontracted continuing airworthiness tasks	

**AMC2 CAO.A.025 Combined airworthiness exposition (CAE)**

- (a) Personnel should be familiar with those parts of the CAE that are relevant to their tasks.
- (b) The CAO may use electronic data processing (EDP) for the publication of the CAE. Attention should be paid to the compatibility of the EDP systems with the necessary dissemination, both internally and externally, of the CAE.

**AMC1 CAO.A.030 Facilities****FACILITIES FOR AN ORGANISATION HOLDING MAINTENANCE PRIVILEGES**

- (a) Where a hangar is not owned by the organisation, it may be necessary to establish proof of tenancy. In addition, sufficiency of hangar space to carry out planned maintenance should be demonstrated by the preparation of a projected aircraft hangar visit plan relative to the AMP. The aircraft hangar visit plan should be updated on a regular basis.
- (b) For balloons and airships, a hangar may not be required where maintenance of the envelope and bottom-end equipment can more appropriately be performed outside, providing all necessary maintenance can be accomplished in accordance with ML.A.402. For complex repairs or component maintenance requiring an EASA Form 1, suitable approved workshops should be provided. The facilities and environmental conditions required for inspection and maintenance should be defined in the CAE.
- (c) Subject to agreement by the competent authority, the organisation may use alternative suitable facilities other than a hangar at the approved location for certain aircraft maintenance tasks, provided that adequate protection from contamination and environment are ensured for the particular work package.
- (d) Protection from the weather elements relates to the normal prevailing local weather elements that are expected throughout any 12-month period. Aircraft hangar and aircraft component workshop structures should be to a standard that prevents the ingress of rain, hail, ice, snow, wind and dust, etc. Aircraft hangar and aircraft component workshop floors should be sealed to minimise dust generation.
- (e) Aircraft maintenance staff should be provided with an area where they may study maintenance instructions and complete continuing airworthiness records in a proper manner.
- (f) Special case for aircraft to which Part-ML applies:
  - (1) It is acceptable not to have access to a hangar or dedicated workshops. Depending on the scope of work, other facilities are acceptable as long as protection is ensured from inclement weather and contamination. This may include, for example, working in the field or in non-aviation premises (closed or not).
  - (2) These facilities do not need to be individually approved by the competent authority as long as the CAE describes for each type of facility the scope of work, the tooling and equipment available, and the permitted environmental conditions (weather, contamination).

- (3) The organisation should include, as part of the quality system/organisational review, a sampling of the compliance with these conditions during certain maintenance events.
- (g) It is acceptable to combine any or all of the office accommodation requirements into one office subject to the staff having sufficient room to carry out the assigned tasks.
- (h) Storage facilities for serviceable aircraft components should be clean, well ventilated and maintained at an even dry temperature to minimise the effects of condensation. The manufacturer's storage recommendations should be followed for those aircraft components identified in such published recommendations.
- (i) Adequate storage racks should be provided and strong enough to hold aircraft components and provide sufficient support for large aircraft components such that the component is not damaged during storage.
- (j) All aircraft components, wherever practicable, should remain packaged in their protective material to minimise damage and corrosion during storage. A shelf life control system should be utilised and identity tags used to identify components.
- (k) 'Segregation' refers to storing unserviceable components in a separate secured location from serviceable components.
- (l) Segregation and management of any unserviceable component should be ensured according to the pertinent procedure approved to that organisation.
- (m) Procedures should be defined by the organisation describing the decision process for the status of unserviceable components. This procedure should identify at least the following:
- (1) role and responsibilities of the persons managing the decision process;
  - (2) description of the decision process to choose between maintaining, storing or mutilating a component; and
  - (3) traceability of decision.
- (n) Once unserviceable components or materials have been identified as unsalvageable in accordance with M.A.501(a)(3) or ML.A.504(c), the organisation should establish secure areas in which to segregate such items and to prevent unauthorised access. Unsalvageable components should be managed through a procedure to ensure that these components receive the appropriate final disposal according to M.A.504(b) or ML.A.504(d) or (e). The person responsible for the implementation of this procedure should be identified.

## AMC1 CAO.A.035(c) Personnel requirements

### KNOWLEDGE, BACKGROUND AND EXPERIENCE OF NOMINATED PERSON(S)

Persons or group of persons nominated in accordance with point CAO.A.035(b) should have:

- (a) practical experience and expertise in the application of aviation safety standards and safe operating practices;
- (b) comprehensive knowledge of:

- (1) Part-M, Part-ML and any associated requirements and procedures; and
- (2) the CAE;
- (c) 5 years aviation experience of which at least 2 years should be from the aeronautical industry in an appropriate position;
- (d) knowledge of a relevant sample of the type(s) of aircraft or components that are within the scope of work. This knowledge may be demonstrated by documented evidence or by an assessment performed by the competent authority.

Training courses, when used as documented evidence, should be as a minimum 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; and

- (e) knowledge of:
  - (1) maintenance standards (including human factor principles); and
  - (2) quality system (or organisational review).

## AMC1 CAO.A.035(e) Personnel requirements

### QUALIFICATION ASSESSMENT

- (a) Personnel involved in maintenance and continuing airworthiness management should be assessed for competence by 'on-the-job' evaluation and/or by examination relevant to their particular job role within the organisation before unsupervised work is permitted.
- (b) Adequate initial and recurrent training should be provided and recorded to ensure continued competence.

## AMC1 CAO.A.045 Airworthiness review staff

- (a) Airworthiness review staff already authorised to perform airworthiness review for an organisation approved in accordance Part-M Subpart F, Part-M Subpart G, Part-CAMO or Part-145 is considered to be authorised in accordance with Part-CAO when such organisation applies for a Part-CAO approval. This means that no additional supervision is needed to be authorised to be accepted to continue carrying out airworthiness reviews. This does not supersede the requirement for the organisation to ensure that all personnel is competent for the job they are authorised.
- (b) 'Experience in continuing airworthiness' in CAO.A.045(a) refers to any appropriate combination of experience in tasks related to aircraft maintenance and/or continuing airworthiness management and/or surveillance of such tasks.
- (c) 'Appropriate recent continuing airworthiness experience' in CAO.A.045(c) refers to the fact that in order to keep the validity of the airworthiness review staff authorisation, the airworthiness review staff should have either:

- (1) been involved in continuing airworthiness management activities for at least 6 months in every 2-year period; or
  - (2) conducted at least one airworthiness review in the last 12-month period.
- (d) 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 valid authorised airworthiness review staff of the CAO concerned in accordance with an approved procedure.
- (e) A person that holds a relevant engineering degree or an aircraft maintenance technician qualification with additional education should be considered as holding the equivalent to an aeronautical degree. ‘Relevant engineering degree’ refers to an engineering degree from mechanical, electrical, electronic, avionics or other studies relevant to the maintenance and continuing airworthiness of aircraft/aircraft components.

### **AMC1 CAO.A.050(a) Components, equipment and tools**

- (a) The tools ‘necessary for day-to-day maintenance’ refers to those needed to perform standard maintenance practices plus those needed in order to complete the normal servicing tasks as well as those needed up to the annual/100-hour or equivalent inspections and which are common to the majority of aircraft contained in the scope of approval.
- (b) The availability of tools rarely used because the particular maintenance task is very rarely performed can be handled through a procedure in accordance with CAO.A.050(a)(2).

### **AMC1 CAO.A.055 Maintenance data and work orders**

It is not required to continuously hold all the maintenance data. It is acceptable to have a procedure to ensure that the specific maintenance data required for a particular maintenance activity will be available before that maintenance takes place.

### **AMC1 CAO.A.060(g) Maintenance standards**

- (a) To minimise the risk of errors and to prevent omissions, the approved CAO when performing maintenance, should ensure that:
  - (1) every maintenance task is signed off only after completion;
  - (2) the grouping of tasks for the purpose of sign-off allows critical steps to be clearly identified; and
  - (3) any work performed by personnel under supervision (i.e. temporary staff, trainees) is checked and signed off by an authorised person.
- (b) To minimise the possibility of an error being repeated in identical tasks that involve removal/installation or assembly/disassembly of several components of the same type fitted to

more than one system, whose failure could have an impact on safety, the approved CAO when performing maintenance should plan different persons to perform identical tasks in different systems. However, when only one person is available, then this person should perform reinspection of the tasks as described in AMC2 CAO.A.060(h).

## AMC1 CAO.A.060(h) Maintenance standards

### CRITICAL MAINTENANCE TASKS

The following maintenance tasks should primarily be reviewed to assess their impact on safety:

- (a) tasks that may affect the control of the aircraft's flight path and attitude, such as the installation, rigging and adjustments of flight controls;
- (b) tasks that may affect aircraft stability control systems (autopilots, fuel transfer);
- (c) tasks that may affect the propulsive force of the aircraft, including the installation of aircraft engines, propellers and rotors; and
- (d) the overhaul, calibration or rigging of engines, propellers, transmissions and gearboxes.

## AMC2 CAO.A.060(h) Maintenance standards

### INDEPENDENT INSPECTION

Independent inspection is one possible error-capturing method.

- (a) What is an independent inspection

An independent inspection is an inspection, which is performed by an 'independent qualified person', of a task carried out by an 'authorised person', taking into account that:

- (1) the 'authorised person' is the person who performs the task or supervises the task, and assumes the full responsibility for the completion of the task in accordance with the applicable maintenance data;
- (2) the 'independent qualified person' is the person who performs the independent inspection and attests to the satisfactory completion of the task, and that no deficiencies have been found. The 'independent qualified person' does not issue a certificate of release to service (CRS); therefore, he or she is not required to hold certification privileges;
- (3) the CRS is issued by the 'authorised person' after the independent inspection has been carried out satisfactorily; and
- (4) the work card system should record the identification of each person, the date and the details of the independent inspection, as necessary, before the CRS is issued.

- (b) Qualifications of personnel performing independent inspections

The organisation should have procedures to demonstrate that the 'independent qualified person' has been trained and has gained experience in the specific control systems to be inspected. This training and experience could be demonstrated, for example, by:

- (i) holding a Part-66 licence in the same subcategory as the licence subcategory or equivalent necessary to release or sign off the critical maintenance task; or
  - (ii) holding a Part-66 licence in the same category and specific training in the task to be inspected; or
  - (iii) having received appropriate training and having gained relevant experience in the specific task to be inspected.
- (c) How to perform an independent inspection

The independent inspection should ensure, for example, the correct assembly, locking and sense of operation of the parts involved. When inspecting control systems that have undergone maintenance, the 'independent qualified person' should consider the following points independently:

- (1) all those parts of the system that have actually been disconnected or disturbed should be inspected for their correct assembly and locking;
  - (2) the system as a whole should be inspected for full and free movement over the complete range;
  - (3) cables should be tensioned correctly with adequate clearance at secondary stops;
  - (4) the operation of the control system as a whole should be observed to ensure that the controls operate in the correct sense;
  - (5) if different control systems are interconnected so that they affect each other, all the interactions should be checked through the full range of the applicable controls; and
  - (6) software that is part of the critical maintenance task should be checked; for example, its version and its compatibility with the aircraft configuration.
- (d) What to do in unforeseen cases when only one person is available

#### REINSPECTION

- (1) Reinspection is subject to the same conditions as the independent inspection is, except that the 'authorised person' performing the maintenance task is also acting as 'independent qualified person' and performs the inspection.
- (2) For critical maintenance tasks, reinspection should only be used in unforeseen circumstances when only one person is available to carry out the task and perform the independent inspection. The circumstances cannot be considered to be unforeseen if the person or organisation has not assigned a suitable 'independent qualified person' to that particular task.
- (3) The CRS is issued by the 'authorised person' after the reinspection has been performed satisfactorily.
- (4) The work card system should record the identification of the 'authorised person' and the date and the details of the reinspection, as necessary, before the CRS is issued.

## GM1 CAO.A.070 Component certificate of release to service

### COMPONENTS MAINTAINED BY A CAO

Appendix II to Part-M, point (5), blocks 12 and 14a describe how the component maintenance release is formalised by the CAO on EASA Form 1.

Used components maintained by a CAO appropriately approved for component maintenance and released on an EASA Form 1 cannot be installed on complex motor-powered aircraft or aircraft used by an air carrier licensed in accordance with Regulation (EC) No 1008/2008.

### AMC1 CAO.A.070(a) Component certificate of release to service

1. An aircraft component which has been maintained off the aircraft requires the issuance of a CRS for such maintenance and another CRS in regard to being installed properly on the aircraft when such installation occurs. When an organisation maintains a component for use by the same organisation, an EASA Form 1 may not be necessary depending upon the organisation's internal release procedures defined in the CAE.
2. In the case of components in storage prior to Part-145, Part-M and Part 21 and not released on an EASA Form 1 or equivalent in accordance with M.A.501(a)(1) or ML.A.501(a), or removed serviceable from a serviceable aircraft or from an aircraft which has been withdrawn from service, the following applies:
  - 2.1. An EASA Form 1 may be issued for an aircraft component which has been:
    - maintained before Part-145 or Part-M became effective, or manufactured before Part 21 became effective;
    - used on an aircraft and removed in a serviceable condition. Examples include leased and loaned aircraft components;
    - removed from aircraft which have been withdrawn from service, or from aircraft which have been involved in abnormal occurrences such as accidents, incidents, heavy landings or lightning strikes;
    - maintained by an unapproved organisation.
  - 2.2. An appropriately rated Part-CAO maintenance organisation may issue an EASA Form 1 as detailed in points 2.5 to 2.9, as appropriate, in accordance with the procedures detailed in the CAE as approved by the competent authority. The appropriately rated Part-CAO maintenance organisation is responsible for ensuring that all reasonable measures have been taken to ensure that only approved and serviceable aircraft components are issued with an EASA Form 1 under this point 2.
  - 2.3. For the purposes of this point 2 only, 'appropriately rated' refers to an organisation with an approval class rating for the type of component or for the product in which it may be installed.

- 2.4. An EASA Form 1 issued in accordance with this point 2 should be issued by signing in block 14b and stating 'Inspected/Tested' in block 11. In addition, block 12 should specify:
- 2.4.1. when the last maintenance was carried out and by whom;
  - 2.4.2. if the component is unused, when the component was manufactured and by whom with a cross reference to any original documentation which should be included in the Form;
  - 2.4.3. a list of all airworthiness directives (ADs), repairs and modifications known to have been incorporated. If no ADs or repairs or modifications are known to be incorporated, then this should be so stated;
  - 2.4.4. the detail of life used for service life-limited parts being any combination of fatigue, overhaul or storage life;
  - 2.4.5. for any aircraft component having its own maintenance history record, reference to the particular maintenance history record as long as the record contains the details that would otherwise be required in block 12. The maintenance history record and acceptance test report or statement, if applicable, should be attached to EASA Form 1.
- 2.5. New/unused aircraft components
- 2.5.1. Any unused aircraft component in storage without an EASA Form 1 up to the effective date(s) for Part 21 that was manufactured by an organisation acceptable to the competent authority at the time may be issued with an EASA Form 1 by an appropriately rated maintenance organisation approved under Part-CAO. EASA Form 1 should be issued in accordance with the following points, which should be included in a procedure within the CAE.
- Note 1: It should be understood that the release of a stored but unused aircraft component in accordance with this point represents a maintenance release under Part-CAO and not a production release under Part 21. It is not intended to bypass the production release procedure agreed by the Member State for parts and subassemblies intended for fitment on the manufacturers' own production line.
- (a) An acceptance test report or statement should be available for all used and unused aircraft components that are subject to acceptance testing after manufacturing or maintenance as appropriate.
  - (b) The aircraft component should be inspected for compliance with the manufacturer's instructions and limitations for storage and condition including any requirement for limited storage life, inhibitors, controlled climate and special storage containers. In addition, or in the absence of specific storage instructions, the aircraft component should be inspected for damage, corrosion and leakage to ensure good condition.
  - (c) The storage life used of any storage life-limited parts should be established.

2.5.2. If it is not possible to establish satisfactory compliance with all applicable conditions specified in point 2.5.1 (a) to (c) inclusive, the aircraft component should be disassembled by an appropriately rated organisation and subjected to a check for incorporated ADs, repairs and modifications and inspected/tested in accordance with the maintenance data to establish satisfactory condition and, if relevant, all seals, lubricants and life-limited parts replaced. Upon satisfactory completion after reassembly, an EASA Form 1 may be issued stating what was carried out and the reference to the maintenance data included.

2.6. Used aircraft components removed from a serviceable aircraft

2.6.1. Serviceable aircraft components removed from a Member State registered aircraft may be issued with an EASA Form 1 by an appropriately rated organisation subject to compliance with this point 2.6.1.

- (a) The organisation should ensure that the component was removed from the aircraft by an appropriately qualified person.
- (b) The aircraft component may only be deemed serviceable if the last flight operation with the component fitted revealed no faults on that component or related system.
- (c) The aircraft component should be inspected for satisfactory condition including in particular damage, corrosion or leakage and compliance with any additional maintenance data.
- (d) The aircraft record should be researched for any unusual events that could affect the serviceability of the aircraft component such as involvement in accidents, incidents, heavy landings or lightning strikes. Under no circumstances may an EASA Form 1 be issued in accordance with this point 2.6 if it is suspected that the aircraft component has been subjected to extremes of stress, temperatures or immersion which could affect its operation.
- (e) A maintenance history record should be available for all used serialised aircraft components.
- (f) Compliance with known modifications and repairs should be established.
- (g) The flight hours/cycles/landings as applicable of any service life-limited parts including time since overhaul should be established.
- (h) Compliance with known applicable airworthiness directives should be established.
- (i) Subject to satisfactory compliance with this point 2.6.1, an EASA Form 1 may be issued and should contain the information as specified in point 2.4 including the aircraft from which the aircraft component was removed.

2.6.2. Serviceable aircraft components removed from a non-Member State registered aircraft may only be issued with an EASA Form 1 if the components are leased or

loaned from the maintenance organisation approved under Part-CAO that retains control of the airworthiness status of the components. An EASA Form 1 may be issued and should contain the information as specified in point 2.4 including the aircraft from which the aircraft component was removed.

2.7. Used aircraft components removed from an aircraft withdrawn from service

Serviceable aircraft components removed from a Member State registered aircraft withdrawn from service may be issued with an EASA Form 1 by a maintenance organisation approved under Part-CAO subject to compliance with this point 2.7.

- (a) Aircraft withdrawn from service are sometimes dismantled for spares. This is considered to be a maintenance activity and should be accomplished under the control of an organisation approved under Part-CAO, employing procedures approved by the competent authority.
- (b) To be eligible for installation, components removed from such aircraft may be issued with an EASA Form 1 by an appropriately rated organisation following a satisfactory assessment.
- (c) As a minimum, the assessment will need to satisfy the standards set out in points 2.5 and 2.6 as appropriate. This should, where known, include the possible need for the alignment of scheduled maintenance that may be necessary to comply with the maintenance programme applicable to the aircraft on which the component is to be installed.
- (d) Irrespective of whether the aircraft holds a certificate of airworthiness or not, the organisation responsible for certifying any removed component should ensure that the manner in which the components were removed and stored are compatible with the standards required by Part-CAO.
- (e) A structured plan should be formulated to control the aircraft disassembly process. The disassembly is to be carried out by an appropriately rated organisation under the supervision of certifying staff, who will ensure that the aircraft components are removed and documented in a structured manner in accordance with the appropriate maintenance data and disassembly plan.
- (f) All recorded aircraft defects should be reviewed and the possible effects these may have on both normal and standby functions of removed components are to be considered.
- (g) Dedicated control documentation is to be used as detailed by the disassembly plan, to facilitate the recording of all maintenance actions and component removals performed during the disassembly process. Components found to be unserviceable are to be identified as such and quarantined pending a decision on the actions to be taken. Records of the maintenance accomplished to establish serviceability are to form part of the component maintenance history.
- (h) Suitable Part-CAO facilities for the removal and storage of removed components are to be used which include suitable environmental conditions, lighting, access

equipment, aircraft tooling and storage facilities for the work to be undertaken. While it may be acceptable for components to be removed, given local environmental conditions, without the benefit of an enclosed facility, subsequent disassembly (if required) and storage of the components should be in accordance with the manufacturer's recommendations.

2.8. Used aircraft components maintained by organisations not approved in accordance with Part-M Subpart F, Part-CAO or Part-145

For used components maintained by a maintenance organisation not approved under Part-M Subpart F, Part-CAO or Part-145, due care should be taken before acceptance of such components. In such cases, an appropriately rated maintenance organisation approved under Part-CAO should establish satisfactory conditions by:

- (a) dismantling the component for sufficient inspection in accordance with the appropriate maintenance data;
- (b) replacing all service life-limited components when no satisfactory evidence of life used is available and/or the components are in an unsatisfactory condition;
- (c) reassembling and testing as necessary the component; and
- (d) completing all certification requirements as specified in CAO.A.070.

In the case of used components maintained by an FAA Part-145 repair station (USA) or by a TCCA CAR573 approved maintenance organisation (Canada) that does not hold an EASA Part-145, Part-CAO or Part-M Subpart F approval, the conditions (a) through (d) described above may be replaced by the following conditions:

- (a) availability of a Form 8130-3 (FAA) or TCCA 24-0078 (TCCA) or an Authorized Release Certificate Form One (TCCA);
- (b) verification of compliance with all applicable airworthiness directives;
- (c) verification that the component does not contain repairs or modifications that have not been approved in accordance with Part 21;
- (d) inspection for satisfactory condition including in particular damage, corrosion or leakage; and
- (e) issuance of an EASA Form 1 in compliance with points 2.2, 2.3 and 2.4.

These alleviated requirements are based on the fact that credit can be taken for their technical capabilities and their competent authority oversight, as attested by the following documents:

- Maintenance Annex Guidance (MAG) between the FAA and EASA
- Maintenance Annex Guidance (MAG) between the TCCA and EASA

2.9. Used aircraft components removed from an aircraft involved in an accident or incident

Such components should only be issued with an EASA Form 1 when processed in accordance with point 2.7 and a specific work order including all additional necessary tests and inspections made necessary by the accident or incident. Such a work order may

require input from the TC holder or original manufacturer as appropriate. This work order should be referenced in block 12.

3. A certificate should not be issued for any component when it is known that the component is unserviceable except in the case of a component undergoing a series of maintenance processes at several approved maintenance organisations and the component needs a certificate for the previous maintenance process carried out for the next approved maintenance organisation to accept the component for subsequent maintenance processes. In such a case, a clear statement of limitation should be endorsed in block 12.
4. The certificate is to be used for export/import purposes, as well as for domestic purposes, and serves as an official certificate for components from the manufacturer/maintenance organisation to users. It should only be issued by organisations approved by a competent authority or the Agency as applicable within the scope of the approval.

### AMC1 CAO.A.075 Continuing airworthiness management

- (a) The CAO holding the CAO.A.095(b) privilege is in charge of the continuing airworthiness management and this includes the tasks specified respectively in M.A.301 points (b), (c), (f), (g) and (h), and ML.A.301 points (b), (c), (d) and (e).
- (b) If the CAO does not hold the appropriate maintenance privilege, then the CAO should conclude a contract with the appropriate maintenance organisation(s) in agreement with the owner/operator.
- (c) The CAO 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.
- (d) The fact that the CAO 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 CAO and the maintenance organisation(s) should specify in detail the responsibilities and the work to be performed by each party.

### AMC1 CAO.A.080 Continuing airworthiness management data

When there is no contract yet for continuing airworthiness management, there is no need to hold the current continuing airworthiness management data.

### GM1 CAO.A.095 Privileges of the organisation

A CAO can be approved to perform airworthiness reviews although it does not hold the privileges of continuing airworthiness management (for aircraft to which Part-ML is applicable). This means that the certificate will show the boxes 'maintenance' and 'airworthiness reviews' ticked.

**AMC1 CAO.A.095(b)(3) Privileges of the organisation****SUBCONTRACTING OF CONTINUING AIRWORTHINESS TASKS**

- (a) The CAO 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 CAO quality system, irrespective of any other approval held by the subcontracted organisation (including CAMO, CAO or Part-145 approval).
- (b) The CAO remains accountable for the satisfactory completion of the continuing airworthiness management tasks irrespective of any contract that may be established.
- (c) In order to fulfil this responsibility, the CAO should be satisfied that the actions taken by the subcontracted organisation meet the standards required by Part-CAO. Therefore, the CAO management of such activities should be accomplished by:
  - (1) active control through direct involvement; and/or
  - (2) endorsing the recommendations made by the subcontracted organisation.
- (d) In order to retain ultimate responsibility, the CAO should limit subcontracted tasks to the activities specified below:
  - (3) airworthiness directive analysis and planning;
  - (4) service bulletin analysis;
  - (5) planning of maintenance;
  - (6) reliability monitoring, engine health monitoring;
  - (7) maintenance programme development and amendments; and
  - (8) any other activities, which do not limit the CAO responsibilities, as agreed by the competent authority.
- (e) The CAO's controls associated with subcontracted continuing airworthiness management tasks should be reflected in the associated contract and be in accordance with the CAO policy and procedures defined in the CAE. When such tasks are subcontracted, the quality system is considered to be extended to the subcontracted organisations.
- (f) 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 subcontracted activities. Where contracts are made with more than one organisation, the CAO should demonstrate that adequate coordination controls are in place and that the individuals' responsibilities are clearly defined in the related contracts.
- (g) Contracts should not authorise the subcontracted organisation to subcontract elements of the continuing airworthiness management tasks to other organisations.
- (h) The competent authority should exercise oversight of the subcontracted activities through the CAO approval. The contracts should be acceptable to the competent authority. The CAO should only subcontract to organisations which are specified by the competent authority on EASA Form 3-CAO (page 2, block titled 'List of organisation(s) working under a quality system').

- (i) The subcontracted organisation should agree to notify the CAO of any changes affecting the contract as soon as practical. The CAO should then inform its competent authority. Failure to do so may invalidate the competent authority's acceptance of the contract.
- (j) Appendix II to AMC1 CAMO.A.125(d)(3) provides information on the subcontracting of continuing airworthiness management tasks by the CAMO. The same principles may be applied to the CAO.

## GM1 CAO.A.100(a) Quality system and organisational review

### QUALITY SYSTEM — GENERAL

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

## AMC1 CAO.A.100(a) Quality system and organisational review

### QUALITY SYSTEM — FEEDBACK

- (a) The quality system should include a feedback system: it should ensure that all findings resulting from the independent audits are properly investigated and corrected in a timely manner. It should address who is required to rectify each non-compliance and the procedure to be followed if rectification is not completed within appropriate timescales. The procedure should enable the accountable manager to be kept informed of any safety issues and the extent of compliance with Part-CAO.
- (b) The audit reports referenced in AMC1 CAO.A.100(b) should be sent to the relevant department for rectification action giving target rectification dates. Rectification dates should be discussed with such department before the quality department or nominated auditor confirms such dates in the report. The relevant department is required to rectify findings and inform the quality manager or the auditor of such rectification.
- (c) The accountable manager should hold regular meetings with staff to check the progress of any corrective actions. If these meetings are delegated to the quality manager on a day-to-day basis, then the accountable manager should:
  - (1) meet the senior staff involved at least twice per year to review the overall performance of the compliance monitoring function; and
  - (2) receive at least a half-yearly summary report on non-compliance findings.

## AMC1 CAO.A.100(b) Quality system and organisational review

### QUALITY SYSTEM — INDEPENDENT AUDIT

- (a) An essential element of the quality system is the independent audit.
- (b) The independent audit should be an objective process of routine sample checks of all aspects of the organisation's ability to carry out continuing airworthiness management and/or maintenance to the standards required by Regulation (EU) No 1321/2014. It should include some product sampling (e.g. product audit) 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- and/or maintenance-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-CAO will be audited.
- (e) The audit plan should ensure that all aspects of Part-CAO compliance are verified every year, including all the subcontracted activities, and the auditing may be carried out as a complete single exercise or (sub)divided 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 rectified, after which the independent audit procedure may revert to a 1-year 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 agreement by the competent authority.
- (g) Where the organisation has more than one location approved, the quality system should include a description of how these locations are integrated into the system, and include a plan to audit each location at a frequency consistent with the extent of activity at the particular location, not exceeding 2 years.
- (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.

### **GM1 CAO.A.100(e) Quality system and organisational review**

An organisation that holds both maintenance and continuing airworthiness management privileges can be considered to be at the same time:

- a small CAO for one privilege; and
- not a small CAO for the other privilege.

In these situations, the organisation is not considered to be a small CAO as a whole.

### **AMC1 CAO.A.100(f) Quality system and organisational review**

#### **ORGANISATIONAL REVIEW**

- 
- (a) The primary objectives of organisational review are to provide a monitoring function on how the organisation ensures compliance with the applicable requirements, policies and procedures, and to request actions where non-compliances are identified.
- (b) The CAO should identify the:
- (1) person responsible for the organisational review;
  - (2) frequency of the reviews;
  - (3) scope and content of the reviews;
  - (4) persons accomplishing the reviews;
  - (5) procedure for planning, performing and processing review findings; and
  - (6) procedure for ensuring corrective actions are carried out in the appropriate time frame.
- (c) Appendix II to AMC1 CAO.A.100(f) should be used to manage the organisational reviews.
- (d) The following continuing airworthiness management activities should not be considered to be subcontracting and, as a consequence, they may be performed without a quality system, although they need to be described in the CAE and be approved by the competent authority:
- (1) Subscription to a technical publisher that provides maintenance data (aircraft maintenance manuals, illustrated parts catalogues, service bulletins, etc.).
  - (2) Contracting the use of a software tool for the management of CAO.A.080 continuing airworthiness data and CAO.A.090 records, provided that:
    - (i) if the tool is used by several organisations, each organisation has access to its own data only;
    - (ii) introduction of data can only be performed by personnel of the CAO; and
    - (iii) the data can be retrieved at any time.

## SECTION B — AUTHORITY REQUIREMENTS

### GM1 CAO.B.017 Means of compliance

#### ALTERNATIVE MEANS OF COMPLIANCE

Alternative means of compliance that are used by a CAO, may be used by another CAO only if they are processed again in accordance with point CAO.B.017(d).

### GM1 CAO.B.045(a) Initial certification procedure

#### FORMAL ACCEPTANCE OF MANAGEMENT STAFF

The approval by the competent authority of the CAE, containing in accordance with CAO.A.025(a)(3) the nominative list of CAO.A.035(a) and (b) persons, constitutes the formal notification of acceptance by the competent authority of this personnel.

### AMC1 CAO.B.045 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 are in compliance with the applicable requirements.
- (c) The audit should focus on the following areas:
  - (1) the management structure, including the names and qualifications of personnel required by points CAO.A.035(b), and the adequacy of the organisation and its management structure;
  - (2) the personnel:
    - (i) the adequacy of the number of staff, and 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 quality system (or organisational review);
  - (4) the facilities and their adequacy regarding the organisation's scope of work;
  - (5) the documentation required by Part-CAO, including:
    - (i) the verification that the procedures specified in the CAE comply with the applicable requirements; and
    - (ii) the 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.

## AMC2 CAO.B.045 Initial certification procedure

### MAINTENANCE DATA

The organisation is not required to continuously hold all the maintenance data. It is acceptable to have a procedure to ensure that the specific maintenance data required for a particular maintenance activity will be available before that maintenance takes place.

However, the organisation should be able to demonstrate its maintenance capability and find means to comply with CAO.A.050(a) when it does not hold all current applicable maintenance data before the approval.

## AMC1 CAO.B.045(c) Initial certification procedure

An EASA Form 613 should be used for this activity (see Appendix I to AMC1 CAO.B.045(c) and AMC1 CAO.B.055(b)).

## AMC1 CAO.B.055 Continuing oversight

At the successful conclusion of the audit(s), including verification of the CAE, an audit report form should be completed by the auditing surveyor including all recorded findings, closure actions and the recommendation. An EASA Form 613 should be used for this activity (see Appendix I to AMC CAO.B.045(c) and CAO.B.055(b)).

A review of EASA Form 613 audit report form should be carried out by a competent independent person nominated by the competent authority. Satisfactory review of the audit form should be indicated by a signature on the audit form.

## AMC2 CAO.B.055 Continuing oversight

### SUBCONTRACTED ACTIVITIES

- (a) If a CAO subcontracts continuing airworthiness management tasks, all subcontracted organisations should also be audited by the competent authority at periods not exceeding 24 months to ensure that the subcontracted continuing airworthiness management tasks are carried out in compliance with Part-CAO, Part-M and Part-ML, as applicable.
- (b) If a CAO subcontracts specialised maintenance tasks, the competent authority should determine whether the subcontracted organisation needs to be audited and included in the oversight programme, taking into account the specific nature and complexity of the subcontracted activities and the results of previous oversight activities of the CAO. Consideration may also be given to subcontracted organisation holding an organisation approval or a certification to an industry standard.
- (c) 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 CAO.

NOTE: When a CAO subcontracts tasks, the competent authority should also ensure that the CAO has sufficient control over the subcontracted organisation.

## AMC1 CAO.B.060(a)(1) Findings

### LEVEL 1 FINDINGS

Where a level 1 finding directly relates to an aircraft, the competent authority should inform the State in which the aircraft is registered.

For a level 1 finding related to maintenance, it may be necessary for the competent authority to ensure that further maintenance and re-certification of all affected products is accomplished, dependent upon the nature of the finding.

## APPENDICES TO AMC AND GM TO PART-CAO

### Appendix I to AMC1 CAO.B.045(c) and AMC1 CAO.B.055 — EASA Form 613

Part-CAO APPROVAL RECOMMENDATION REPORT	EASA FORM 613
Part 1: General	
Name of organisation:	
Approval reference:	
Requested approval rating:	
EASA Form 3-CAO dated*:	
Other approvals held (if applicable):	
Address of facility audited:	
Audit period: from	to
Date(s) of audit(s):	
Audit reference(s):	
Persons interviewed:	
Competent authority inspector(s):	Signature(s):
Competent authority office:	Date of EASA Form 613 Part 1 completion:
*delete where applicable	

Part-CAO APPROVAL RECOMMENDATION REPORT		EASA FORM 613				
Part 2: Part-CAO Compliance audit review						
The five columns may be labelled and used as necessary to record the approval product line or facility, including the subcontractor's, reviewed. Against each column used regarding the following Part-CAO points, please either tick (√) the box if satisfied with compliance or cross (X) the box if not satisfied with compliance, and specify the reference of the Part 4 finding next to the box; or enter N/A if an item is not applicable; or N/R if it is applicable but it was not reviewed.						
Point	Subject					
CAO.A.017	Means of compliance	<input type="checkbox"/>				
CAO.A.020	Terms of approval	<input type="checkbox"/>				
CAO.A.025	Combined airworthiness exposition (see Part 3)	<input type="checkbox"/>				
CAO.A.030	Facilities	<input type="checkbox"/>				
CAO.A.035	Personnel requirements	<input type="checkbox"/>				
CAO.A.040	Certifying staff	<input type="checkbox"/>				
CAO.A.045	Airworthiness review staff	<input type="checkbox"/>				
CAO.A.050	Components, equipment and tools	<input type="checkbox"/>				
CAO.A.055	Maintenance data and work orders	<input type="checkbox"/>				
CAO.A.060	Maintenance standards	<input type="checkbox"/>				
CAO.A.065	Aircraft certificate of release to service	<input type="checkbox"/>				
CAO.A.070	Component certificate of release to service	<input type="checkbox"/>				
CAO.A.075	Continuing-airworthiness management	<input type="checkbox"/>				
CAO.A.080	Continuing-airworthiness management data	<input type="checkbox"/>				
CAO.A.085	Airworthiness review	<input type="checkbox"/>				
CAO.A.090	Record-keeping	<input type="checkbox"/>				
CAO.A.095	Privileges of the organisation	<input type="checkbox"/>				
CAO.A.100	Quality system and organisational review	<input type="checkbox"/>				
CAO.A.105	Changes to the organisation	<input type="checkbox"/>				

Competent authority inspector(s):

Signature(s):

Competent authority office:

Date of EASA Form 613 Part 2 completion:

Part-CAO APPROVAL RECOMMENDATION REPORT		EASA FORM 613
Part 3: Compliance with the combined airworthiness exposition (CAE) 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 if an item is not applicable; or N/R if it is applicable but it was not reviewed.		
<b>Part A</b>	<b>GENERAL DESCRIPTION</b>	
A.1	<input type="checkbox"/>	Statement by the accountable manager
A.2	<input type="checkbox"/>	General presentation of the organisation
A.3	<input type="checkbox"/>	Description and location of the facilities
A.4	<input type="checkbox"/>	Scope of work
A.5	<input type="checkbox"/>	Exposition amendments and changes to the organisation
A.6	<input type="checkbox"/>	Procedure for alternative means of compliance
A.7	<input type="checkbox"/>	Management personnel
A.8	<input type="checkbox"/>	Organisation chart
A.9	<input type="checkbox"/>	Manpower resources
A.10	<input type="checkbox"/>	List of certifying staff
A.11	<input type="checkbox"/>	List of staff responsible for the development and approval of the AMP
A.12	<input type="checkbox"/>	List of airworthiness review staff
A.13	<input type="checkbox"/>	List of staff responsible for the issuance of permits to fly
<b>Part B</b>	<b>GENERAL PROCEDURES</b>	
B.1	<input type="checkbox"/>	Quality (or organisational review) system
B.2	<input type="checkbox"/>	Audit plan (or frequency and content of organisational review)
B.3	<input type="checkbox"/>	Monitoring of maintenance contracts
B.4	<input type="checkbox"/>	Qualification, assessment and training of staff
B.5	<input type="checkbox"/>	One-off certification authorisation
B.6	<input type="checkbox"/>	Limited certification authorisation
B.7	<input type="checkbox"/>	Subcontracting
B.8	<input type="checkbox"/>	Maintenance data and continuing airworthiness management data
B.9	<input type="checkbox"/>	Records management and retention
B.10	<input type="checkbox"/>	Carrying out the airworthiness review
B.11	<input type="checkbox"/>	Conformity with approved flight conditions
B.12	<input type="checkbox"/>	Issue of the permit to fly
<b>Part C</b>	<b>MAINTENANCE PROCEDURES</b>	
C.1	<input type="checkbox"/>	Maintenance — general
C.2	<input type="checkbox"/>	Work order acceptance
C.3	<input type="checkbox"/>	Components, equipment, tools and material (supply, acceptance, segregation, storage, calibration, etc.)
C.4	<input type="checkbox"/>	Maintenance facility (selection, organisation, cleanliness and environmental limitations)

Part-CAO APPROVAL RECOMMENDATION REPORT		EASA FORM 613
Part 3: Compliance with the combined airworthiness exposition (CAE) 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 if an item is not applicable; or N/R if it is applicable but it was not reviewed.		
C.5	<input type="checkbox"/>	Maintenance accomplishment and maintenance standards
C.6	<input type="checkbox"/>	Prevention of maintenance error
C.7	<input type="checkbox"/>	Critical maintenance tasks and error-capturing method
C.8	<input type="checkbox"/>	Fabrication
C.9	<input type="checkbox"/>	Certifying staff responsibilities and maintenance release
C.10	<input type="checkbox"/>	Defects arising during maintenance
C.11	<input type="checkbox"/>	Maintenance away from approved location
C.12	<input type="checkbox"/>	Procedure for component maintenance under aircraft or engine rating
C.13	<input type="checkbox"/>	Procedure for maintenance on installed engine (or component) under engine (or component) rating
C.14	<input type="checkbox"/>	Special procedures (specialised tasks, non-destructive testing (NDT), engine running, etc.)
C.15	<input type="checkbox"/>	Issue of ARC under maintenance privilege
Part D CONTINUING AIRWORTHINESS MANAGEMENT PROCEDURES		
D.1	<input type="checkbox"/>	Continuing airworthiness management — general
D.2	<input type="checkbox"/>	MEL (and CDL) application
D.3	<input type="checkbox"/>	AMP development, control and periodic review
D.4	<input type="checkbox"/>	Airworthiness directives and other mandatory airworthiness requirements
D.5	<input type="checkbox"/>	Modifications and repairs
D.6	<input type="checkbox"/>	Pre-flight inspection
D.7	<input type="checkbox"/>	Defects
D.8	<input type="checkbox"/>	Establishment of contracts and work orders for the maintenance
D.9	<input type="checkbox"/>	Coordination of maintenance activities
D.10	<input type="checkbox"/>	Mass and balance statement
D.11	<input type="checkbox"/>	Issue of ARC or ARC recommendation
D.12	<input type="checkbox"/>	ARC extension
D.13	<input type="checkbox"/>	Maintenance check flights
Part E SUPPORTING DOCUMENTS		
E.1	<input type="checkbox"/>	Sample documents
E.2	<input type="checkbox"/>	List of subcontracted organisations
E.3	<input type="checkbox"/>	List of organisations contracted by the CAO
E.4	<input type="checkbox"/>	Aircraft technical log system (if applicable)
E.5	<input type="checkbox"/>	List of the currently approved alternative means of compliance
E.6	<input type="checkbox"/>	Copy of contracts for subcontracted continuing airworthiness tasks

Part-CAO APPROVAL RECOMMENDATION REPORT		EASA FORM 613
Part 3: Compliance with the combined airworthiness exposition (CAE) 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 if an item is not applicable; or N/R if it is applicable but it was not reviewed.		
CAE reference:	CAE amendment:	
Competent authority audit staff:	Signature(s):	
Competent authority office:	Date of EASA Form 613 Part 3 completion:	

Part-CAO APPROVAL RECOMMENDATION REPORT		EASA FORM 613			
Part 4: Findings regarding Part-CAO compliance status Each level 1 and 2 finding should be recorded whether it has been rectified or not, and should be identified by a simple cross reference to the Part 2 requirement. All non-rectified findings should be copied in writing to the organisation for them to take the necessary corrective action.					
Part 2 or 3 ref.	Audit reference(s): Findings	L e v e l	Corrective action		
			Date due	Date closed	Reference

Part-CAO APPROVAL RECOMMENDATION REPORT		EASA FORM 613
<b>Part 5: Part-CAO approval or continued approval or change recommendation*</b>		
Name of organisation:		
Approval reference:		
Audit reference(s):		
The following Part-CAO terms of approval are recommended for this organisation:		
Or, it is recommended that the Part-CAO terms of approval specified in EASA Form 3-CAO referenced .....		
Name of recommending competent authority inspector:		
Signature of recommending competent authority inspector:		
Competent authority office:		
Date of recommendation:		
EASA Form 613 review:	Date:	
*delete as appropriate		

## Appendix II to AMC1 CAO.A.100(f) — Organisational review

Depending on the complexity of the small organisation (number and type of aircraft, number of different fleets, privilege to perform airworthiness reviews, etc.), the organisational review system may vary from a system using the principles and practices of a quality system (except for the requirement of independence) to a simplified system adapted to the low complexity of the organisation and the aircraft managed.

As a core minimum, the organisational review system should have the following features, which should be described in the CAE:

- (a) Identification of the person responsible for the organisational review programme  
By default, this person should be the accountable manager, unless he or she delegates this responsibility to (one of) the CAO.A.035(b) person(s).
- (b) Identification and qualification criteria for the person(s) responsible for performing the organisational reviews

These persons should have a thorough knowledge of the regulations and of the organisation procedures. They should also have knowledge of audits, acquired through training or through experience (preferably as an auditor, but also possibly because they actively participated in several audits conducted by the competent authority).

(c) Elaboration of the organisational review programme

- (1) Checklist(s) covering all items necessary to be satisfied that the organisation delivers a safe product and complies with the regulation. All procedures described in the CAE should be addressed.
- (2) A schedule for the accomplishment of the checklist items. Each item should be checked at least every 12 months. The organisation may choose to conduct one full review annually or to conduct several partial reviews.

(d) Performance of organisational reviews

Each checklist item should be answered using an appropriate combination of:

- review of records, documentation, etc.;
- sample check of aircraft under contract or being maintained under a work order;
- interview of personnel involved;
- review of discrepancies and internal reports (e.g. notified difficulties when using current procedures and tools, systematic deviations from procedures, etc.);
- review of complaints filed by customers.

(e) Management of findings and occurrence reports

All findings should be recorded and notified to the affected persons.

- (1) All findings that lower the safety standard and seriously hazard flight safety should be immediately notified to the competent authority and all necessary actions on aircraft in service should be immediately taken.
- (2) All occurrence reports should be reviewed with the aim of continuous improvement of the system by identifying possible corrective and preventive actions. This should be done in order to find prior indicators (e.g. notified difficulties when using current procedures and tools, systematic deviations from procedures, unsafe behaviours, etc.), and dismissed alerts that, had they been recognised and appropriately managed before the event, could have resulted in the undesired event being prevented.
- (3) Corrective and preventive actions should be approved by the person responsible for the organisational review programme and implemented within a specified time frame.
- (4) Once the person responsible for the organisational review programme is satisfied that the corrective action is effective, the closure of the finding should be recorded along with a summary of the corrective action.
- (5) The accountable manager should be notified of all significant findings and, on a regular basis, of the global results of the organisational review programme.

Below is a typical example of a simplified organisational review checklist, **to be adapted as necessary to cover the CAE procedures used and the privileges held by the organisation:**

**1. Scope of work**

- Check that all aircraft under contract are covered in EASA Form 3-CAO.
- Check that the scope of work in the CAE is consistent with EASA Form 3-CAO.
- Check that no work has been performed outside the scope of EASA Form 3-CAO and the CAE.
- Is it justified to retain in the approved scope of work aircraft types for which the organisation has no longer aircraft under contract?

**2. Maintenance data**

- Check that the maintenance data is present and up to date for the ongoing maintenance activity.
- Check that no change has been made to the maintenance data from the design approval holder (DAH) without the DAH being notified.

**3. Equipment and tools**

- Check the availability of maintenance equipment and tools against the lists in the CAE and check if they are still appropriate with regard to the maintenance data.
- Check tools for proper calibration (sample check).

**4. Stores**

- Do the stores meet the criteria of the CAE procedures?
- Check by sampling some items in the store for presence of proper documentation and any overdue items.

**5. Certification of maintenance**

- Has maintenance on products and components been properly certified?
- Have implementations of modifications/repairs been carried out with appropriate approval of such modifications/repairs (sample check)?

**6. Maintenance contracted**

- Sample check of maintenance records:
  - Existence and adequacy of the work order;
  - Data received from the maintenance organisation:
    - valid CRS including any deferred maintenance;
    - list of removed and installed components and copy of the associated EASA Form 1 or equivalent.
- Obtain a copy of the current approval certificate (EASA Form 3) of the maintenance organisations contracted.

**7. Maintenance subcontracted**

Check that subcontractors for specialised services are properly controlled by the organisation.

**8. Relations with the owners/operators — maintenance**

- Has maintenance been carried out with suitable work orders?
- When a maintenance contract has been signed with an owner/operator, have the obligations of the contracts been respected by both parties?

#### **9. Relations with the owners/operators — continuing airworthiness management**

- Has a contract (in accordance with Appendix I to Part-M or Appendix I to Part-ML) been signed with each external owner/operator, covering all the aircraft whose airworthiness is managed by the CAO?
- Have the owners/operators under contract fulfilled their obligations identified in the contract? As appropriate:
  - Are the pre-flight checks correctly performed? (interview of pilots)
  - Is the technical log or equivalent correctly used (record of flight hours/cycles, defects reported by the pilot, identification of what maintenance is next due, etc.)?
  - Have flights occurred with overdue maintenance or with defects not properly rectified or deferred? (sample check from the aircraft records)
  - Has maintenance been performed without notifying the CAO (sample check from the aircraft records, interview of the owner/operator)?

#### **10. Maintenance records**

- Have the maintenance actions been properly recorded?
- Perform a sample check of maintenance records (including EASA Form 1 or equivalent, and certificates of conformity) to ensure completeness and storage during the appropriate periods.

#### **11. Continuing airworthiness records**

- Perform a sample check of continuing airworthiness records to ensure completeness and storage during the appropriate periods.
- Is storage of computerised data properly ensured?

#### **12. Airworthiness review and permit to fly records**

Perform a sample check of airworthiness review and permit to fly records to ensure completeness and storage during the appropriate periods.

#### **13. Airworthiness situation of the fleet**

Does the continuing airworthiness status (AD, maintenance programme, life-limited components, deferred maintenance, ARC validity) show any expired items? If so, are the aircraft grounded?

#### **14. Aircraft maintenance programme (AMP) development and control**

- For Part-ML aircraft, ensure that the AMP has been approved by the CAO and has been subject to annual review.
- For Part-M aircraft, check that all revisions to the DAH instructions for continuing airworthiness (ICA), since the last review, have been (or are planned to be) incorporated in the maintenance programme, unless otherwise approved by the competent authority.
- Has the maintenance programme taken into account all modifications or repairs?

- Have all maintenance programme amendments been approved at the right level (CAO, competent authority or indirect approval)?
- Does the status of compliance with the maintenance programme reflect the latest approved maintenance programme?
- How has the organisation managed:
  - the tolerances (variations) to the AMP intervals?
  - the deviations from the maintenance tasks to be performed in accordance with the AMP?
- Have the deviations from the DAH ICA in the development of the AMP been properly justified and recorded?

**15. ADs (and other safety measures mandated by the competent authority or EASA)**

- Have all ADs issued since the last review been incorporated into the AD status?
- Does the AD status correctly reflect the AD content: applicability, compliance date, periodicity, etc.? (sample check on ADs)

**16. Modifications/repairs**

- Are all modifications/repairs listed in the corresponding status approved in accordance with M.A.304 or ML.A.304? (sample check on modifications/repairs)
- Have all the modifications/repairs which have been installed since the last review been incorporated in the corresponding status? (sample check from the aircraft/component logbooks or equivalent)

**17. Personnel**

- Check that the current accountable manager and other nominated persons are correctly identified in the approved CAE.
- If the number of personnel has decreased or if the activity has increased, check that the organisation has still sufficient and adequate staff.
- Check that the qualification of all new personnel (or personnel with new functions) has been appropriately assessed.
- Check that the staff has been trained, as necessary, to cover changes in:
  - regulations;
  - competent authority publications;
  - the CAE and associated procedures;
  - the approved scope of work;
  - maintenance data (significant ADs, ICA amendments, etc.).

**18. Occurrence reporting procedures**

Check that reporting is properly performed, actions taken and recorded.

**19. Airworthiness review and permit to fly procedures**

- Have airworthiness reviews been properly performed and the airworthiness review certificate or recommendation been properly issued?

- 
- Have permits to fly been properly issued and the approved flight condition been complied with?

## Appendix III to AMC1 CAO.A.015 — EASA Form 2

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