ANNEX II TO ED DECISION 2022/017/R

Acceptable Means of Compliance (AMC) and Guidance Material (GM)
to Annex Vc (Part-CAMO) to Commission Regulation (EU) No 1321/2014

Issue 1 — Amendment 3

The text of the amendment is arranged to show deleted text, new or amended text as shown below:
— deleted text is struck through;
— new or amended text is highlighted in blue;
— an ellipsis ‘[…]’ indicates that the rest of the text is unchanged.

Note to the reader
In amended, and in particular in existing (that is, unchanged) text, ‘Agency’ is used interchangeably with ‘EASA’. The interchangeable use of these two terms is more apparent in the consolidated versions. Therefore, please note that both terms refer to the ‘European Union Aviation Safety Agency (EASA)’. 
AMC1 CAMO.A.115(b)(2) Application for an organisation certificate

DOCUMENTATION FOR DEMONSTRATION OF COMPLIANCE

[...]

c) When point M.A.201(ea) is applied, the continuing airworthiness management contract with the operator(s) in accordance with Appendix I to Annex I (Part-M) to Regulation (EU) No 1321/2014 should be submitted together with the CAME.

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;
(6) contracts between the CAMO and operators forming part of a single air carrier business grouping, in accordance with point M.A.201(ea).

AMC2 CAMO.A.150 Findings

FINDINGS RELATED TO THE CAMO’S MANAGEMENT SYSTEM THAT IS HARMONISED WITH THE MANAGEMENT SYSTEM OF ANOTHER APPROVED ORGANISATION

If a finding that is raised by the competent authority (or non-compliance that is detected by the compliance monitoring function) affects the harmonisation of the management system of the CAMO with the management system of the contracting operator(s), which is required by point M.A.201(ea), the CAMO should inform the operator(s) to ensure that proper actions are taken within the group. The CAMO and operator(s) should agree on the appropriate channel for such communication.

If the group use common standards to facilitate the harmonisation of the organisations’ management systems, the CAMO should inform the group management board or similar group governance body.

GM1 CAMO.A.200(e) Management system

INTEGRATION AND HARMONISATION OF THE MANAGEMENT SYSTEMS

(a) ‘Management system’ within the scope of Regulation (EU) No 1321/2014 means a set of interrelated or interacting organisation policies, procedures, standards and processes to achieve certain objectives under an overarching safety culture.
(b) Under point CAMO.A.200(d), an integrated management system occurs when the same organisation holds several approvals and its management system combines policies, procedures, and standards from various areas into a single structure, thus avoiding isolated procedures for common processes. The lines of responsibility and accountability of the organisation that holds an air operator certificate (AOC) and a CAMO approval are linked directly to the corporate authority of the operator’s accountable manager. This may be supported by a common manual (e.g. a common safety management manual).

(c) If organisations forming part of a single air carrier business grouping decide to facilitate the harmonisation of their management systems through standards, those standards will cover the common or consistent methods and procedures. Other elements of the management system may be covered at the discretion of the organisation, to provide flexibility and thus leverage synergy or cooperation. Harmonising management systems requires extensive and continuous exchange of information on hazard identification, safety risk management methods, strategic decisions, safety actions, compliance monitoring, and best practices.

(d) Within a single air carrier business grouping, the CAMO plays a key role in the cooperation between the operators that use that CAMO, and in the harmonisation of their management systems.

(e) Contracting a CAMO in accordance with point M.A.201(ea) implies that at least two operators will use that CAMO. As the operators’ management systems should be harmonised with the CAMO’s management system, they will also be harmonised with one another.

AMC3 CAMO.A.300 Continuing airworthiness management exposition (CAME)

If a CAMO is contracted by operators forming part of a single air carrier business grouping (in accordance with point M.A.201(ea)) the CAME should also include how requirements and procedures that are specific to the different operators are implemented.

GM1 CAMO.A.305(b) Personnel requirements

When a CAMO is contracted (in accordance with point M.A.201(ea)) by one or more operators that form part of a single air carrier business grouping but not of the same legal entity, those operator(s) and CAMO do not have to appoint the same accountable manager.
AMC1 CAMO.A.300(a)(1) Continuing airworthiness management exposition (CAME)

ACCOUNTABLE MANAGER STATEMENT

[...]

2. [...]  

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.

For organisations also approved as air carriers licensed in accordance with Regulation (EC) No 1008/2008, suspension or revocation of the CAMO certificate will invalidate the air operator certificate (AOC) of such air carriers.

[...]

AMC1 CAMO.A.305(g) Personnel requirements

COMPETENCY ASSESSMENT OBJECTIVES

[...]

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

[...]

(e) Criteria should allow the assessment to establish that, among other aspects (titles might be different in each organisation):

[...]

(8) If the CAMO is contracted by air carriers forming part of a single air carrier business grouping (in accordance with point M.A.201(ea)), the CAMO should ensure that all relevant personnel have sufficient skills in the agreed common language, e.g. English.

[...]

GM1 CAMO.B.300(a);(b);(c) Oversight principles

MANAGEMENT SYSTEM MATURITY LEVELS

Regarding the evaluation of the maturity of the management systems, the following definitions apply:

— ‘present’: there is evidence that the process/feature is documented in the organisation’s management system/safety management system (SMS) documentation;

— ‘suitable’: the process/feature is suitable based on the size, nature, and complexity of the organisation, and the inherent risk in the activity;

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— ‘operating’: there is evidence that the process/feature is in use and an output is being produced;
— ‘effective’: there is evidence that the process/feature is achieving the desired outcome and has a positive safety impact.

GM1 CAMO.B.300(g) Oversight principles

COOPERATION BETWEEN COMPETENT AUTHORITIES

When a contract is concluded between a CAMO and an operator in accordance with point M.A.201(ea), which may occur during an initial CAMO application or an application for a change (requiring prior approval), the competent authorities of the CAMO and of the operator need to cooperate.

This cooperation between the different competent authorities may be established through a cooperative oversight agreement. That agreement will focus on the information that is relevant for performing the competent authority’s tasks, and be proportional to the nature and complexity of the organisations’ activities. It will cover at least the following aspects:

(a) General information

(1) Scope of the cooperation and identification of the operator (or operators if the competent authorities agree to include in a single agreement several operators that use the same CAMO) and the CAMO.

(2) Nomination of focal points in each competent authority; changing the focal points does not imply a full revision of the cooperation agreement.

(3) Meetings held between the competent authorities to ensure that all remain informed of significant issues.

(4) Provisions for the resolution of conflicts or disagreements.

(b) Oversight

(1) Sharing of the oversight programme that is implemented by each competent authority (e.g. audit plan and audit programme especially regarding the oversight of the management system), including the competent authorities' assessment of the complexity of the organisations’ activities.

(2) Sharing of the management system assessment approach that is used by each competent authority (refer also to GM2 CAMO.B.300(g)).

(3) Sharing of the results of the management system assessments.

(4) Performance of oversight tasks on the CAMO by the competent authorities responsible for the operator, on behalf of the competent authority of the CAMO, if such arrangement exists.

(5) Participation of inspectors from one competent authority as observers during the performance of oversight tasks by another competent authority, or joint audits/assessments by different competent authorities.
(6) Specific support, if needed, to assist in the inclusion of an aircraft into the AOC, when transferred from one AOC holder to another within the group.

(7) Sharing of information on how the CAMO and operator manage their tasks, to adapt oversight accordingly, such as, but not limited to, the following:

(i) the selection of aircraft subject to product audits as part of the oversight of the CAMO may consider information that comes from the competent authorities of the operator(s), which is provided to the competent authority of the CAMO;

(ii) information on the use and completion of the aircraft technical log system or on the use of the minimum equipment list (MEL) by the operator, which is reported by the competent authority of the CAMO to the competent authority of the relevant operator, may be considered in the operator’s oversight programme;

(iii) sharing of information on the interfaces between the operator(s) and the CAMO regarding the assessment of non-mandatory modifications and/or inspections and the decision on their application as per point CAMO.A.315(b)(4); and

(iv) sharing of information on the system in place between the operator(s) and the CAMO to ensure that pre-flight inspections are properly accomplished.

(c) Additional cooperation provisions

(1) Sharing of information between competent authorities, as well as methods and timing for that sharing, e.g. the result of the assessment of the management system is shared every time the assessment is conducted by one of the competent authorities.

(2) A cooperation mechanism to ensure prompt reaction if one of the competent authorities shares serious concerns about the organisation with another competent authority.

(3) Information to be provided to the competent authority of the operator before integrating an aircraft to the AOC

(4) Sharing of information between competent authorities before granting any specific approval (e.g. Part-SPA, AMC 20-6, etc.).

(5) Sharing of the relevant operator’s and CAMO’s occurrence reports as well as of the procedures in place between relevant competent authorities to ensure coordinated follow-up and resolution, where applicable.

(6) Sharing of changes in the exposition and manuals when those changes impact harmonised procedures.

GM2 CAMO.B.300(g) Oversight principles

ASSESSMENT OF HARMONISED MANAGEMENT SYSTEMS

(a) One of the core capabilities that are required for supporting the effective implementation of safety management is the ability to monitor the effectiveness of an organisation’s management system. Competent authorities assess that effectiveness as part of their oversight activities. Cooperation between several competent authorities on that assessment is necessary, especially
when different organisations have harmonised management systems as required by point M.A.201(ea).

(b) To ensure cooperative oversight and sound decision-making regarding oversight across a single air carrier business grouping, the competent authorities involved are expected to provide for the following:

1. Use a common approach to the assessment of the management system, including the continuous improvement of the management systems across the operator(s) and the CAMO involved. Different competent authorities may not necessarily use the same tool to assess the maturity of the harmonised management systems. However, they will coordinate on this matter and share with one another to which extent their assessment approach follows the principles that are set out in GM1 CAMO.B.300(a);(b);(c). This way, all competent authorities involved will have an overall understanding of how each competent authority evaluates compliance and effectiveness of the management system(s).

2. When a finding is raised on a harmonised procedure or, if used, on a group standard, the other competent authority(ies) is/are informed, and the related root cause analysis and corrective action plan that are developed by the operator(s) and CAMO concerned are shared with all competent authorities involved. In addition, the informed competent authority(ies) will assess if such a finding is relevant for the organisation under its/their oversight and, depending on the conclusion of such an assessment, will take appropriate action (e.g. take no action, communicate with the organisation or with the competent authority that raised the finding, or raise a finding itself/themselves).

(c) Regarding the duration of the oversight planning cycle of the organisations whose management systems are harmonised:

1. even if the management systems of organisations are harmonised with each other, the maturity levels of those management systems may differ; as the oversight planning cycle is mainly driven by the management system’s maturity and the organisation’s compliance records, some organisations may have an oversight planning cycle of 24 months (or less) and others a 36- or 48-month cycle;

2. the competent authorities involved will inform each other when the duration of the oversight planning cycle of the organisation(s) under their oversight is to be increased or reduced.
AMC1 CAMO.B.310 Initial certification procedure

VERIFICATION OF COMPLIANCE

[...]

(c) The audit should focus on the following areas:

[...]

(5) The documentation based on which the certificate should be granted (i.e. the documentation required by Part-CAMO), including the continuing airworthiness management contract when point M.A.201(ea) is applied:

[...]

GM1 CAMO.B.310 and CAMO.B.330 Initial certification procedure and changes

In relation to point M.A.201(ea), if an application, submission, receipt, certificate, or other document is submitted to a competent authority in a language different from the official language of the Member State of that authority, that authority may request a translation.