



# Explanatory Note to Decision 2022/017/R

## Continuing airworthiness management in a single air carrier business grouping

### ‘Amendments to the Acceptable Means of Compliance and Guidance Material to Regulations (EU) Nos 1321/2014 and 965/2012’

RELATED NPA 2021-101 & OPINION NO 04/2021 — RMT.0734

#### EXECUTIVE SUMMARY

The objective of this Decision is to facilitate the implementation of the requirements introduced by Regulation (EU) 2022/410, which amended Regulation (EU) No 1321/2014 (‘Continuing Airworthiness (CAW) Regulation’) as regards the CAW management in a single air carrier business grouping.

This Decision amends the Acceptable Means of Compliance (AMC) & Guidance Material (GM) to Annex I (Part-M) and Annex Vc (Part-CAMO) to the CAW Regulation, as well as the AMC & GM to Annex III (Part-ORO) to Regulation (EU) No 965/2012 (‘Air OPS Regulation’) regarding the following topics:

- definition of a ‘single air carrier business grouping’;
- harmonisation of the management systems of the organisations involved;
- cooperation in the oversight by competent authorities (CAs) of the organisations involved; and
- nomination by the operator of the person responsible for the management and supervision of the contract with a CAMO.

<b>Domain:</b>	Maintenance and management of continuing airworthiness
<b>Related rules:</b>	AMC & GM to the CAW Regulation; AMC & GM to the Air Ops Regulation
<b>Affected stakeholders:</b>	CAMOs; single air carrier business grouping operators; CAs
<b>Driver:</b>	Efficiency/proportionality
<b>Impact assessment:</b>	Yes
<b>Rulemaking group:</b>	Dedicated expert group

#### EASA rulemaking procedure milestones

Start Terms of Reference	Advisory Body Consultation NPA 2021-101 (draft Opinion and Decision)	Proposal to the Commission Opinion No 04/2021	Adoption by the Commission Implementing Regulation (EU) 2022/410	Decision Acceptable Means of Compliance and Guidance Material
5.1.2021	18.6.2021	15.9.2021	10.3.2022	2.9.2022



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## 1. About this Decision

The European Union Aviation Safety Agency (EASA) developed Decision 2022/017/R in line with Regulation (EU) 2018/1139<sup>1</sup> ('Basic Regulation') and the Rulemaking Procedure<sup>2</sup>.

This Decision results from the activities undertaken under Rulemaking Task (RMT.0734) ('One CAMO for airline business groups'), which is included in Volume II of the [European Plan for Aviation Safety \(EPAS\) for 2022-2026](#). The scope and timescales of the task were defined in the related Terms of Reference (ToR)<sup>3</sup>.

EASA developed the *draft* text of this Decision with the support of an expert group, which was composed of representatives of national competent authorities (NCAs) of Member States (MSs) (Finland, France, Germany, Ireland, Luxembourg) and industry (Airlines for Europe (A4E)). The EASA Advisory Bodies (ABs) were consulted on the draft text through Notice of Proposed Amendment (NPA) 2021-101 (draft Opinion and Decision).

EASA reviewed the comments received during the AB consultation. Considering the input from the consultation, EASA published Opinion No 04/2021 on 15 September 2021, with a summary of the comments in Section 2.4. The Opinion was addressed to the European Commission, which adopted Regulation (EU) 2022/410 on 10 March 2022<sup>4</sup> based on the Opinion.

EASA has also published as an annex to the Opinion Acceptable Means of Compliance (AMC) and Guidance Material (GM) to Annex I (Part-M) and Annex Vc (Part-CAMO) to Commission Regulation (EU) No 1321/2014 ('Continuing Airworthiness (CAW) Regulation')<sup>5</sup>, for information only. The EASA ABs were consulted on that *draft* text on 25 May 2022.

EASA developed the *final* text of this Decision with the AMC and GM in consideration of the comments received, and published the Decision on the Official Publication<sup>6</sup> of EASA.

The major milestones of this RMT are presented on the cover page.

<sup>1</sup> Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1535612134845&uri=CELEX:32018R1139>).

<sup>2</sup> EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 01-2022 of 2 May 2022 on the procedure to be applied by EASA for the issuing of opinions, certification specifications and other detailed specifications, acceptable means of compliance and guidance material ('Rulemaking Procedure'), and repealing MB Decision No 18-2015 (<https://www.easa.europa.eu/the-agency/management-board/decisions/easa-mb-decision-01-2022-rulemaking-procedure-repealing-mb>).

<sup>3</sup> <https://www.easa.europa.eu/document-library/terms-of-reference-and-group-compositions/tor-rmt0734>

<sup>4</sup> Commission Implementing Regulation (EU) 2022/410 of 10 March 2022 amending Regulation (EU) No 1321/2014 as regards the continuing airworthiness management in a single air carrier business grouping (OJ L 84, 11.3.2022, p. 20) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32022R0410>).

<sup>5</sup> Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 362, 17.12.2014, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32014R1321&qid=1660209148597>).

<sup>6</sup> <https://www.easa.europa.eu/official-publication>



## 2. In summary — why and what

### 2.1. Why we need to amend the AMC and GM — issue/rationale

Commission Implementing Regulation (EU) 2022/410 was adopted on 10 March 2022 and published in the EU Official Journal on the following day. That Regulation amended the CAW Regulation as regards the CAW management in a single air carrier business grouping. The related AMC and GM to the CAW Regulation need therefore to be amended accordingly.

### 2.2. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. This Decision will contribute to achieving the overall objectives by addressing the issue described in Section 2.1.

The specific objective of this Decision is to facilitate the implementation of the requirements introduced into the CAW Regulation by Regulation (EU) 2022/410:

### 2.3. How we want to achieve it — AMC & GM to Part-M, Part-CAMO, and Part-ORO

The objectives laid down in Section 2.2. can be achieved by:

- defining a ‘single air carrier business grouping’ in the framework of the CAW Regulation;
- easing the harmonisation of the management systems of the organisations involved, including the assessments by the competent authorities (CAs);
- enhancing the CAs’ cooperation in the oversight of the organisations involved through cooperative oversight agreements; and
- specifying the knowledge and experience of the person, nominated by the operator, responsible for the management and supervision of the contract with the CAMO.

To this end, the following AMC & GM are introduced or amended:

- a new GM1 M.1(3)(ii) to address the transfer of the approval of the aircraft maintenance programme from the MS of registry to the MS of the operator, CAMO or combined airworthiness organisation (CAO) if the conditions in point M.1(3)(ii) of Annex I (Part-M) to the CAW Regulation apply;
- several new AMC & GM to point M.A.201(ea):
  - to address the harmonisation of the management systems of the organisations involved, also by establishing group standards and a group management board or similar group governance;
  - to provide for the use of a common language between the organisations involved and the NCAs;
  - to clarify the meaning of a ‘single air carrier business grouping’ in the framework of the CAW Regulation; and
  - to provide examples that illustrate different schemes of possible operator–CAMO combinations;



- a new GM1 M.A.306(b) to explain the use of an interoperable aircraft technical log system for all operators involved when there is the intention to regularly transfer aircraft from one operator to another within the business group;
- a new AMC2 CAMO.A.150 to address findings related to the management system that is harmonised with the management system of another approved organisation;
- a new GM1 CAMO.A.200(e) to explain the meaning of integration and harmonisation when referring to management systems;
- a new GM1 CAMO.A.305(b) to explain that the operator(s) and CAMO do not have to appoint the same accountable manager when point M.A.201(ea) of Part-M is applied;
- new GM to various points of point CAMO.B.300 of Annex Vc (Part-CAMO) to the CAW Regulation to explain how the cooperation between NCAs can be established, including definitions that are linked to the evaluation of the maturity of the management systems;
- a new AMC and new GM to point ORO.AOC.135(a)(4) of Annex III (Part-ORO) to Regulation (EU) No 965/2012<sup>7</sup> ('Air OPS Regulation') to describe the knowledge, experience, and responsibility of the person, nominated by the operator, responsible for the management and supervision of the contract with a CAMO in accordance with point M.A.201(ea) of Part-M; and

Some changes/adjustments are made to other AMC & GM to maintain consistency among the different points within the CAW and Air OPS Regulations.

#### 2.4. What are the stakeholders' views — outcome of the consultation

51 comments to the draft AMC & GM from 7 stakeholders (5 from NCAs and 2 from industry) were received by EASA during the consultation with the EASA ABs. The following points were more frequently commented on:

- GM1 CAMO.B.300(g) Oversight principles – Cooperation between competent authorities (7 comments);
- AMC1 M.A.201(ea) Responsibilities – Harmonisation of the management systems (6 comments);
- GM1 M.A.201(ea) Responsibilities – Harmonisation of the management systems, group standards and changes (5 comments); and
- GM2 M.A.201(ea) Responsibilities – Air carrier business grouping (5 comments).

EASA reviewed all the comments and, where deemed necessary, amended the text that was initially proposed. For further details on the outcome of the AB consultation, please refer to Appendix I to this Explanatory Note (Section 4.1.).

#### 2.5. What are the benefits and drawbacks of the amendments

The benefits and drawbacks of the requirements that were proposed to the European Commission through Opinion No 04/2021, as well as of the related AMC & GM, had been assessed during the

<sup>7</sup> Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 296, 25.10.2012, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32012R0965&qid=1661852859700>).



consultation of NPA 2021-101 (draft Opinion and Decision) with the EASA ABs. The AMC & GM have no further benefits or drawbacks than those described in Opinion No 04/2021 (see Section 2.5).



### 3. References

#### 3.1. Related EU regulations

- Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 362, 17.12.2014, p. 1)
- Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 296, 25.10.2012, p. 1)

#### 3.2. Related EASA decisions

- Executive Director Decision 2015/029/R of 17 December 2015 issuing acceptable means of compliance and guidance material Part-M, Part-145, Part-66, and Part-147 of Regulation (EU) No 1321/2014 and repealing Decision 2003/19/RM of the Executive Director of the Agency of 28 November 2003 ‘AMC and GM to the Annexes to Regulation (EU) No 1321/2014 — Issue 2’
- Executive Director Decision 2020/002/R of 13 March 2020 amending the Acceptable Means of Compliance and Guidance Material to Annex I (Part-M), Annex II (Part-145), Annex III (Part-66), Annex IV (Part-147) and Annex Va (Part-T) to as well as to the articles of Commission Regulation (EU) No 1321/2014, and issuing Acceptable Means of Compliance and Guidance Material to Annex Vb (Part-ML), Annex Vc (Part-CAMO) and Annex Vd (Part-CAO) to that Regulation ‘AMC & GM to Annex Vc (Part-CAMO) to Commission Regulation (EU) No 1321/2014 “Issue 1”’
- Decision 2014/017/R of the Executive Director of the Agency of 24 April 2014 adopting Acceptable Means of Compliance and Guidance Material to Part-ORO of Regulation (EU) No 965/2012 and repealing Decision 2012/017/R of the Executive Director of the Agency of 24 October 2012 ‘AMC and GM to Part-ORO — Issue 2’

#### 3.3. Other reference documents

N/a



## 4. Related document

### 4.1. Appendix I — Advisory Bodies' comments to the draft AMC & GM, and EASA's responses

In responding to the comments, the following terminology is applied to attest EASA's position:

- (a) **Accepted** — EASA agrees with the comment and any proposed change is incorporated into the text.
- (b) **Partially accepted** — EASA either partially agrees with the comment or agrees with it, but the proposed change is partially incorporated into the text.
- (c) **Noted** — EASA acknowledges the comment, but no change to the text is considered necessary.
- (d) **Not accepted** — EASA does not agree with the comment or proposed change.





Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
<b>Direction Générale de l'Aviation Civile (DGAC-Fr)</b>	1	General comment	<p>EASA recently shared through the OPS TeB a final draft document titled "Guidance for the oversight of group operations" providing competent authorities with guidance for the oversight of group operation in the Air Operations domain, where operators holding AOCs issued by different Member States are engaged in a single business grouping. That subject is directly linked and relevant to RMT.0734. However, several concepts and proposals contained in that guidance are not developed as part of RMT.0374 AMC/GM package. The OPS guidance seems to go further compared to what is covered in the proposed AMC/GM. For example:</p> <ul style="list-style-type: none"> <li>- "validation" process described in §3.1 of the OSA guidance does not exist in RMT.0734.</li> <li>- The concept of having one competent authority acting as a "lead" authority (audits coordinations, etc.) in §3.2 of the OPS guidance does not exist in RMT.0734.</li> <li>- The entire management of change/modification process described in §3.3 of the OPS guidance which suggests the use of a single and common procedure for all operators of the group and a common agreement between the involved competent authorities for changes/modifications requiring prior approval does not exist in RMT.0734.</li> <li>- Finding management is more prescriptive in the OPS guidance (§3.3.3) compared to the proposed RMT.0734 AMC/GM.</li> <li>- The content of the competent authority cooperation agreement is more detailed in the OPS guidance (§3.8) compared to the proposed RMT.0734 AMC/GM.</li> <li>- Etc.</li> </ul>	N/a	Noted



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
			<p>Even if the OPS guidance does not constitute acceptable means of compliance (Article 76(3) of (EU) 2018/1139), these differences between OPS guidance and CAW AMC/GM might create confusion.</p> <p>The proposed AMC/GM package for CAW is acceptable to DGAC France. Nevertheless, better coordination between OPS and CAW would have been necessary to avoid any confusion.</p>		



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
DGAC-Fr	2	Point (b)(i) of GM2 CAMO.B.300(g)	<p>The definitions provided in the proposed GM1 CAMO.B.300(a);(b);(c) are welcome and DGAC France believes that further details (through an update of the existing AMC) will be necessary in the future to better standardise the way competent authorities assess management systems maturity (this is key when several competent authorities are to oversight harmonised management systems as required by M.A.201(ea)).</p> <p>Referring to GM1 CAMO.B.300(a);(b);(c) in point (b)(i) of GM2 CAMO.B.300(g) seems not enough as the objective is to ensure that the involved competent authorities share there management system assessment approach as a whole to make sure that they understand how each involved authority proceed in management system maturity evaluation.</p>	<p>Perform the following change in point (b)(i) of GM2 CAMO.B.300(g):</p> <p>"A common approach to management system assessment and continuous improvement of management systems across the operator(s) and the CAMO involved is implemented. Competent authorities should not necessarily use the same tool to assess the harmonised management systems maturity. However, they will coordinate and share to which extent their assessment approach adopts the principles set out in CAMO.B.300 and corresponding AMC/GM in order for all involved competent authorities to have an overall understanding of how compliance and effectiveness of the management system is evaluated by each competent authority."</p>	<p>Not accepted</p> <p>The wording proposed by DGAC-Fr, which introduces a reference to point CAMO.B.300 (implementing rule (IR)), suggests that there is an <i>extent</i> to which one can comply with the IR. The other AMC to point CAMO.B.300 (as adopted by this Decision) do not provide additional information on how to achieve that DGAC-Fr objective; therefore, including such a reference is not necessary.</p>
The Civil Aviation Authority of Belgium (CAA Belgium)	1	GM1 M.A.201(ea) AMC1 M.A.201(ea)(a)(4)	<p>The AMC1 M.A.201(ea)(a)(4) states "Common or consistent safety management key processes (AMC1 CAMO.A.200(a)(3) Management system) where applicable and when there is obvious reason to be harmonised". In this GM, it seems necessary to clarify the "where applicable" and the "when there is obvious reason to be harmonised" in order to avoid inconsistent implementation.</p>	<p>Clarify the "where applicable" and the "when there is obvious reason to be harmonised" in order to avoid inconsistent implementation.</p>	<p>Accepted</p> <p>Point (a)(4) of AMC1 M.A.201(ea) was reworded accordingly.</p>



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
			The above clarification is also necessary taking into account GM1 CAMO.A.200(e)(e) which talks about the need of a harmonised management system, which includes includes policies, procedures, standards and processes as defined in GM1 CAMO.A.200(e)(a).		
CAA Belgium	2	GM1 M.A.201(ea)(d)	Instead of "in each organisation exposition", shouldn't be "in the organisation exposition"? Indeed ,as reflected by different charts GM3 MA.201(ea), there is always only one CAMO managing the aircraft for the involved operators.	Instead of "in each organisation exposition" it should be "in the organisation exposition"	Not accepted  The intent here is to also address the operator(s) that contract(s) the continuing airworthiness management organisation (CAMO) and use(s) the group standards.  Note: there could be two CAMOs in a group of four air operator's certificate (AOC) holders (see GM3 M.A.201(ea)).
CAA Belgium	3	GM1 M.A.201(ea)(e)	Amongst the elements listed in the GM1 M.A.201(e) as making part of "group standards", to have a broader picture of what group standards are, It seems useful to add the "common or consistent methods and procedures" as reflected GM1 CAMO.A.200(e)(c).		Accepted  'methods and procedures ...' inserted to point (e) of GM1 M.A.201(ea).
CAA Belgium	4	ORO.AOC.135(a)(f) and AMC1 ORO.AOC.135(a)(4)	The person responsible for the supervision of the continuing airworthiness contract is something not new in ORO.AOC.135(a)(f), but so far, criteria for such a person were not defined.  The Belgian CAA raised already this issue with EASA in the past. Now, ORO.AOC.135(a)(f) is amended and refers to the new AMC1 ORO.AOC.135(a)(4) defining such criteria, but only in case of single CAMO contracted pursuant to M.A.201(ea).		Noted  These aspects will be considered in future rulemaking tasks (RMTs) within the Air OPS domain (Regulation (EU)



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
			Even if it not related to the reasons behind these new AMCs, <b>in our view, it is now the opportunity to define such criteria for commecial operators contracting CAMO pursuant to M.A.201, such as SPO operators.</b> (ORO.SPO.100 requires compliance with ORO.AOC.135, GM2 SPO.100(a) refers to ORO.AOC.135).		No 965/2012 ('Air OPS Regulation').
CAA Belgium	5	AMC1 ORO.AOC.135(a)(4)	A clear description of the responsibilities of the person ensuring the management and supervision of the continuing airworthiness management contract should be clearly defined.		Accepted  GM1 ORO.AOC.135(a)(4) is introduced to address this.
CAA Belgium	6	GM1 CAMO.B.300(g)	<p>In case of different Competent Authorities for the CAMO and the operator's (e.g.: Operator and CAMO in 2 different Member States), we would expect in this GM much more <b>clarification regarding for example, what should the CA of the operator perform as task in the oversight of the CAMO</b> and therefore how to deal with that in the cooperatiive agreement with the CA of the CAMO.</p> <p>In GM1 CAMO.B.300(g)(b), most specifically, the items (b)(1), (b)(4) and (b)(5), while talking about the exchange of oversight programme, the prformance of oversight tasks on the CAMO by the competent authority responsible for operator on behalf of the authority of the CAMO, it can be understood that the CA of the operator has a certain responsibility for the oversight of the overall continuing airworthiness system of CAMO.</p> <p>In our understanding, this responsibility is clear only on the management system due to the required harmonisation between the CAMO and the operators.</p> <p>According to CAMO.B.305(g), performing oversight task of the CAMO by the competent authority of the operator is only an option.</p>		<p>Partially accepted</p> <p>Point CAMO.B.300(d) already provides for this mechanism. Therefore, there is no need to specify the tasks that should be given to the other competent authority (CA).</p> <p>In terms of responsibility, the CA of the CAMO is responsible; the statement 'on behalf of the CA of the CAMO' makes it clear. However, EASA agrees that such an arrangement is only one option of many.</p>



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
CAA Belgium	7	GM1 M.A.201(ea)	There is no clear definition of what a "business group" is	add a clear definition of "a business group"	Accepted  'Business group' was replaced by 'business grouping', which is defined in GM2 M.A.201(ea).
CAA Belgium	7a	GM2 M.A.201(ea)	There is no clear definition of what a "single air carrier business grouping" is	add a clear definition of a "single air carrier business grouping"	Not accepted  This definition is based on Article 2(1)(b) of Directive 2009/38/EC.
CAA Belgium	8	GM M.A.201	the applicability of M.A.201(ea) is limited to licensed carriers, it would be useful to extend this to all commercial operations.	extend the applicability in the roster.	Noted  Regulation (EU) 2022/410 limits this provision to licenced air carriers.
CAA Belgium	9	AMC1 M.A.201(ea), AMC2 M.A.201, GM1 M.A.201(ea)	These are all requirements for the management organisation, and should therefore be in Part-CAMO, not in Part-M.	Move items under Part-CAMO	Not accepted  These requirements are also in part obligations to the operator; therefore, Annex I (Part-M) to Regulation (EU) No 1321/2014 ('CAW Regulation') is considered to be the proper place.
Agencia Estatal de Seguridad Aérea (AESA) (The Spanish National Aviation	1	GM1 M.1(3)(ii)	CAOs are not been taking in consideration. They are one of the organisations managing the continuing airworthiness of the aircraft (M.1. (i3) (ii)(b)) as well as CAMOs.	Include AMP indirect approval privilege for CAO.	Accepted



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
<b>Authority (NAA)</b>					
<b>AESA (The Spanish NAA)</b>	2	M.A.901(b)	It has not be considered the implementation of the "One CAMO" on the "controlled environment" concept.	Include a new AMC M.A.901(b) considering the migration of the management of some aircraft between CAMOs in the same business group. For instance, in the second example of proposed GM3 M.A.201(ea), aircrafts managed by CAMO1, CAMO2 and CAMO3 are going to be managed by CAMO4. If these CAMOs have similar approved procedures and the same oversight authority, it's reasonable we can consider these aircraft are kept on a controlled environment. Otherwise, competent authority will be overloaded because of the number of ARC to be issued (based on recommendations).	Not accepted  The proposed AMC would establish non-compliance with the CAW Regulation.  Setting up a 'group CAMO' structure (point M.A.201(ea)) will effectively mean a change of CAMO for one or more AOC holders. This implies that the aircraft to be transferred to the 'group CAMO' will de facto be no longer under controlled environment (point M.A.901(b)(1)) after the transfer. This means that in accordance with the CAW Regulation, such aircraft will not be able to benefit from the possibility to have their airworthiness review certificate (ARC) 'extended'. In that context, the CA is invited to evaluate on a case-by-case basis whether a specific set-up creates the conditions to consider that the aircraft remains in



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
					controlled environment, and in such case, whether Article 71 of the Basic Regulation could be applied.
<b>AESA (The Spanish NAA)</b>	3	Appendix I, point 7.2 and 7.3, subpoints 4	It'd be useful having some syllabus for the required training courses.	Include AMCs with the training requirements for both courses.	Not accepted  The training will be dependent on the arrangement and contract between the AOC holder and the CAMO; therefore, it should be developed by those organisations.
<b>AESA (The Spanish NAA)</b>	4	AMC2 CAMO.A.150	Minor grammatical errors: "If the group use common standards to facilitate the harmonisation of the organisations management systems, the CAMO [...]"	If the group uses common standards to facilitate the harmonisation of the organisations'/organisation management systems, the CAMO [...]	Accepted
<b>AESA (The Spanish NAA)</b>	5	CAMO.A.200(e)	It's not considered to allow sharing an unique management system for the whole business group.	Include a new AMC CAMO.A.200(e) allowing to share a common management system (including nominated personnel) for several AOCs and an "One CAMO". Regulation refers to management systems harmonization, but it not consider the possibility of having a common management system for the whole business group.	Not accepted  According to point (a) of GM1 CAMO.A.200(e), a management system means <i>a set of interrelated or interacting organisation policies, procedures, standards, and processes to achieve certain objectives under an overarching safety culture.</i>  This 'management system' definition goes beyond the





Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
					use of safety management system (SMS) procedures. EASA considers that different legal entities will necessarily have differences in their procedures; hence, it is not suitable to refer to 'integrated' management, but to a harmonised management system.
<b>AESA (The Spanish NAA)</b>	6	GM2 CAMO.B.300(g), (b)	Minor grammatical error: "the competent authorities involved is expected to ensure that:"	the competent authorities involved are expected to ensure that:	Accepted
<b>AESA (The Spanish NAA)</b>	7	Regulation (EU) 965/2012	AMC and GM similar to the one for M.A.201 are necessary, related to harmonization of SMS and relationship among undertakings, in Reg (EU) 965/2012	Include additional AMC and GM in Reg (EU) 965/2012	Noted  These aspects will be considered in future RMTs under the 'Group Operation' initiative. However, please note that the requirements of point M.A.201 apply to operators.
<b>AESA (The Spanish NAA)</b>	8	Regulation (EU) 965/2012, AMC1 ORO.AOC,135(a)(4), point (c)	Add a requirement of knowledge on airworthiness regulation.	Require knowledge on Regulation (EU) 1321/2014.	Accepted
<b>AESA (The Spanish NAA) Operations Department</b>	1	Regulation (EU) 965/2012, AMC1 ORO.AOC,135(a)(4), point (c)	Add a requirement of knowledge on airworthiness regulation.	Require knowledge on Regulation (EU) 1321/2014.	Accepted



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
<b>AESA (Spanish NAA) Operations Department</b>	2	Regulation (EU) 965/2012	Both AOCs and CAMO belong to the same business group, that is why some harmonization among AOCs MS will be required as it has been discussed within the OPS GO group	Include additional AMC and GM to explain the harmonization of AOCs MS and relationship among undertakings based on the guidance material of GO working group.	Noted  These aspects will be considered in future RMTs under the 'Group Operation' initiative.
<b>The Civil Aviation Authority of Norway (CAA Norway)</b>	1		<p>Norway is of the opinion that the issue of a single centralised CAMO within a business group of AOCs is addressed too broadly, in such a way that it encompasses far more than just this CAMO flexibility. Norway has extensive experience in overseeing a consortium with multiple AOCs in multiple countries, both through the Scandinavian collaboration with oversight of SAS (ref Reg 2018/1139 Article 62 subsection 5 a) and b)), and in the last decade with oversight of AOCs in the Norwegian group – prior to the forced restructuring of the latter under Irish “Chapter 11” protection. One of the fundamental pillars of an AOC, is that it is an individual legal entity where the AM and his/her management system are fully and autonomously responsible for its management and operations. I.e. there cannot be an entity outside the AOC that overrules decisions made by the AM in support of his/her NP-level of managers, as the AM is ultimately responsible to the competent authority.</p> <p>In the provided AMC/GM material, there are requirements and guidelines that in practise moves this responsibility up to group level.</p>		<p>Noted/Not accepted</p> <p>These AMC &amp; GM were developed considering that each organisation remains responsible for their activities (see point (b) of GM2 M.A.201(ea)).</p> <p>'Group standards' are developed and/or used on a cooperative basis. The positive effect of such group standards is the harmonisation of the management systems of the organisations that use them.</p>



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
CAA Norway	2	AMC1 M.A.201(ea) Responsibilities	<ul style="list-style-type: none"> <li>• (1) Here it is made mandatory to establish a group-forum that should be considered a “common safety review board” and include “accountable managers, safety managers and any other relevant nominated person”. <ul style="list-style-type: none"> <li>o The safety review board as explained in AMC1 ORO.GEN.200(a)(1);(b) is a high level committee that considers matters of strategic safety. The meeting is chaired by the AM and include heads of functional areas. SRB is composed of the top management because strategic decisions are made here.</li> <li>o The new “group SRB” is described in a similar way, where the participants are those who normally attends the AOC internal SRB. So is this meant to be a meeting that at group level can override the individual AOC?</li> </ul> </li> <li>§ Our scepticism is not a theoretical ‘what if...’, but empirical experience from similar constructs in the old Norwegian group.</li> <li>• (2) The regular exchange of results and conclusions of compliance monitoring and competent authority oversight. <ul style="list-style-type: none"> <li>o This might look good on paper, but in reality it may force changes in individual AOC’s that are at odds with what the local competent authority has decided. We know this from experience.</li> </ul> </li> <li>• (3) Common or consistent safety policy and related safety objectives. <ul style="list-style-type: none"> <li>o This might work if the AOC’s in the group operates in a similar environment with similar equipment and a similar operation. However, the suggested regulation doesn’t place any such restraints on what organisations that can participate in such a group. The overall owner structure seems to be the guiding prerequisite here, not the overall similarities between AOC’s.</li> </ul> </li> </ul>		<p>Partially accepted</p> <p>On (1)</p> <p>The main objective of point (a)(1) of AMC1 M.A.201(ea) is to establish a forum at group level to <u>exchange views</u> on safety matters, in order to keep the different management systems (of the various organisations) harmonised. EASA agrees that a reference to a single safety review board (SRB) might lead to misinterpretations regarding the allocation of responsibilities in each organisation, and that reference was therefore is deleted.</p> <p>Note: AMC are not ‘mandatory’.</p> <p>On (2)</p> <p>‘Exchange’ does not mean implementing the same measures/corrective actions; it raises awareness of concrete problems that</p>



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
			<ul style="list-style-type: none"> <li>• (6) Cooperation mechanism to ensure proper actions are taken at group level in case of findings to one organisation affecting the harmonisation of management systems.</li> <li>o This point actually requires the group to install mechanisms that can enforce actions and decisions outside the AOC level upon the individual AOC's.</li> </ul> <p>The GM that follows, enhances the impression of creating an overarching "group management" that can override the individual AOC's.</p>		<p>occur in the other organisation(s). This should certainly not be ignored.</p> <p>A sentence is added to clarify the purpose of such exchange.</p> <p>On (3)</p> <p>The focus here is not on harmonising between AOCs holders, but on harmonising between CAMOs and AOC(s). The point was reworded for clarity.</p> <p>On (6)</p> <p>This point refers to 'cooperation' at group level, not to decision-making. The point was reworded accordingly.</p> <p>Concerning the 'GM that follows' (i.e. GM1 M.A.201(ea)), it was completely reworded to avoid the impression that an 'overarching' entity decides on behalf of the controlled entities. However, the notion of cooperation is maintained.</p>



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
CAA Norway	3	GM2 M.A.201(ea)	<p>AIR CARRIER BUSINESS GROUPING</p> <ul style="list-style-type: none"> <li>(a) States that "...'single air carrier business grouping' means a controlling undertaking and its controlled undertakings. All these undertakings can be located in territory(ies) for which one or more Member States are responsible under the Chicago Convention"</li> </ul> <p>o If we interpret this correctly, that means any number of the "undertakings" (individual AOC's) can be outside of the EU. That is fine and well with regard to the CAMO tasks in isolation, but as the AMC above states this also include coordination and decisions at management level in general, how will this coordination and decision making be possible if the AOC's are certified under different regulations?</p> <p>In general, our experience with coordination and harmonisation within a group structure covering multiple AOC's and multiple countries, is that it is extremely difficult to accomplish. It will either deteriorate and drift apart, or inevitably lead to a kind of "super management" that overrides all its AOC members from a central vantage point driven by pure financial considerations.</p> <p>If you look at the sharing of a single service provider (that be a CAMO or some other entity), the main difference from an ordinary contracted activity, is that an ordinary contract can be terminated by the contractor. That is the power the AOC holds over the contracted entity if it doesn't deliver according to agreement. In a consortium the option of cancelling a contract if quality or contract agreements are breached, are non-existent. An individual AOC cannot terminate a contract when the contracted entity is owned by the group, or the contract enforced by the group. That eliminates an essential controlling tool from the contractor.</p>		<p>Accepted (and noted)</p> <p>Point (a) was modified to refer to 'the territory to which the Treaties apply', to reflect the text that is used in point M.A.201(ea).</p>



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
			We also know from experience that the level of coordination required between entities inside such a business group, is only surpassed by the amount of coordination required between the competent authorities that oversees the individual AOC's in the group. We have seen the authority of the individual AOC managements quickly watered out to nothing, and that the local management that are ultimately responsible to their individual competent authority, ends up being marionettes to a hidden command structure in the group, primarily staffed by financial officers close to the group owners and investors.		
CAA Norway	4	GM1 CAMO.B.300(g) Oversight principles	There are no provisions addressing the transition period from having several individual CAMOs to establishing a single centralized CAMO. At what point in time is the competent authority that receives/approves an application for establishment of a single CAMO obligated to inform the other relevant competent authority(ies), such that all relevant authorities are informed and a part of the process, before the issuance of a single centralized CAMO approval is given to an single air carrier business grouping.		The first sentence of GM1 CAMO.B.300(g) covers the establishment of a 'one CAMO' structure, and reminds the CAs of their obligation to cooperate. Cooperation certainly requires early contacts and exchange of views between the CAs, but the GM did not intend to cover such aspects.
CAA Norway	5	AMCs and GMs M.A.201(ea) on harmonisation of management systems	There is need for more details with regards the following: how harmonisation of mgt systems could be achieved and how to oversee and verify that it is effective. Statements like "CAMO procedures should describe how the interface and harmonisation with the operators' management system is achieved" - what is expected? The main challenge here is formalities/documentation/intentions vs. the job as done. There appears to be no requirement to record minutes of "harmonisation, cooperation, management board" meetings		Accepted  Point (b) of AMC1 M.A.201(ea) was modified to include a reference to 'the records to be retained in respect of the harmonisation activities of the management systems.



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
CAA Norway	6	GM2 M.A.201(ea)	The definition of the term 'single air carrier business grouping' is quite difficult to interpret/understand.		Noted  The definition is simple: "single air carrier business grouping' means a controlling undertaking and its controlled undertakings", and is based on Article 2(1)(b) of Directive 2009/38/EC <sup>8</sup> .  Comments on the remainder of the GM have already been responded to.
CAA Norway	7	AMC2 CAMO.A.150 Findings	<i>If a finding raised by the competent authority (or a non-compliance detected by the compliance monitoring function) affects the harmonisation of the management system with the management system of the contracting operator(s) required by point M.A.201(ea), the CAMO should inform the operators to ensure proper actions are taken within the group. If the group use common standards to facilitate the harmonisation of the organisations management systems, the CAMO should inform the group management board or other similar integrated group governance body.</i>  Is this describing a separate or additional system to the one required by ORO.GEN.200(a)(6)? Who in that case is involved and who is responsible?		Accepted  The AMC was modified to address the comment.

<sup>8</sup> Directive 2009/38/EC of the European Parliament and of the Council of 6 May 2009 on the establishment of a European Works Council or a procedure in Community-scale undertakings and Community-scale groups of undertakings for the purposes of informing and consulting employees (Recast) (OJ L 122, 16.5.2009, p. 28) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32009L0038&qid=1660815126702>).



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
CAA Norway	8	GM1 CAMO.B.300(g) Oversight principles	<p>This should probably be an AMC, in order to ensure same level of compliance between authorities.</p> <p>Probably a print error in (a)(3) <i>Meetings convened between the competent authority to ensure all remain informed of significant issues.</i> (should be authorities - plural)</p> <p><i>(b)(6) Specific oversight tasks, if any, to be carried out when aircraft are transferred from one AOC to another in the group.</i></p> <p>Is this intended to modify the processes for lease-in approval according to ORO.AOC.110?</p> <p><i>(c)(6) Sharing the changes of the exposition and manuals when those changes impact harmonised procedures.</i></p> <p>How do authorities keep track of which procedures are harmonised (CAMO, OM, SMM, CMM, QM)?</p>		<p>Partially accepted</p> <p>The GM also helps to standardise the expectations stemming from the requirements of point CAMO.B.300(g).</p> <p>On (b)(6)</p> <p>The provisions were clarified.</p> <p>On (c)(6)</p> <p>There are many different ways to achieve this objective; this should be addressed by the CA at the time of implementation, in coordination with the CAMO.</p>





Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
CAA Norway	9	GM1 CAMO.B.300(g) Oversight principles	<p>(c)(5) How is handling of reporting of occurrences and other safety-related information (mandatory, voluntary ref. 376/2014) intended to be addressed formally and practically?</p> <p>Issues are e.g. maintenance related MORs will be reported only to the state where the CAMO is approved, leaving the state of the operator in the dark. This affects the handling of individual reports which are not uncommonly cross-domain (Airworthiness-Operations) and reducing the data available for such as statistics, analysis and assessment of the state safety performance level.</p> <p>Similar challenges with collection, processing of and feedback from internal Company (AOC and CAMO) occurrence/safety reports between different organisations and legal systems.</p>		<p>Partially accepted</p> <p>This is addressed in point (c)(5) of GM1 CAMO.B.300(g).</p> <p>Besides, it has been determined under RMT.0681 (on harmonisation of Regulation (EU) No 748/2012<sup>9</sup> ('Initial Airworthiness (IAW) Regulation') and the CAW Regulation with Regulation (EU) No 376/2014<sup>10</sup> ('Occurrence Reporting')) that the Part-CAMO occurrence reporting requirements need to be amended: This will include an obligation to report to the operator that has contracted the CAMO, who in turn will have to report to the CA of the operator. This rule change is planned to be</p>

<sup>9</sup> Commission Regulation (EU) No 748/2012 of 3 August 2012 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations (OJ L 224, 21.8.2012, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32012R0748&qid=1660656216536>).

<sup>10</sup> Regulation (EU) No 376/2014 of the European Parliament and of the Council of 3 April 2014 on the reporting, analysis and follow-up of occurrences in civil aviation, amending Regulation (EU) No 996/2010 of the European Parliament and of the Council and repealing Directive 2003/42/EC of the European Parliament and of the Council and Commission Regulations (EC) No 1321/2007 and (EC) No 1330/2007 (OJ L 122, 24.4.2014, p. 18) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32014R0376&qid=1660661605619>).



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
					proposed with an Opinion addressing both RMT.0278 'Importing of aircraft from other regulatory systems and Part 21 Subpart H review' and RMT.0521 'Airworthiness review process'.
<b>Airbus</b>	1	General	<p>A large portion of the proposed AMC/GM discusses the coordination measures (the "how") to take between the licensed air carrier(s) and the CAMO.</p> <p>The newly authorised separation of organisations requires an exchange of data (the "what") between them, like in point M.A.301(h). This is not sufficiently detailed to support the explanations on the "how", for certain data:</p> <ul style="list-style-type: none"> <li>- the pre-flight inspection programme (CAMO to operator), points M.A.301(a) and CAT.GEN.MPA.105(a)(12)</li> <li>- the MEL/CDL (operator to CAMO), points ORO.MLR.100 (and AMC/GM) and M.A.301(b)</li> <li>- AFM/MEL/CDL/WB-related AD accomplishment data (operator to CAMO), points ORO.GEN.155 and M.A.301(f)(1)</li> </ul>	<ul style="list-style-type: none"> <li>- Develop AMC/GM for Part-M (and Part-ML, if possible) about data exchanges between involved parties.</li> <li>- Amend AMC1 CAMO.A.315(b)(4) about the assessment of non-mandatory modifications and inspections (and, by the way, any other forms of non-mandatory maintenance, like an overhaul, a replacement, etc...) and the decision on their application (involvement of the operators).</li> <li>- Develop AMC/GM for Regulation (EU) 965/2012 for data exchanges between involved parties.</li> </ul>	<p>Noted</p> <p>These aspects will be considered in future RMTs within the Air OPS and CAW domains.</p>



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
			<p>- operational directives (operator to CAMO), point CAT.POL.MAB.100(b) or CAT.POL.H.305(b)(2) for example, and point M.A.301(f)(2)</p> <p>- configuration data (CAMO to operator), points M.A.301(g) and CAT.POL.MAB.100(b) or ORO.MLR.100 (for the Operations Manual update... e.g. AFM/MEL contents sometimes depend on the current aircraft configuration following modification or repair) for example.</p> <p>Note: GM1 M.A.306(b) addresses the aircraft technical log system.</p>		
<b>Airbus</b>	2	GM1 M.1(3)(ii)	<p>With this GM, readers may have the impression the Agency's intent is to explain how the EU Regulation addresses the provisions of Article 83bis of the Chicago Convention (transfer of certain functions and duties).</p> <p>Airbus supports this initiative and recommends complementing this GM with another for Article 1 of Regulation (EU) No 1321/2014.</p>	<p>Develop GM Article 1 Transfer of certain functions and duties. This GM should explain at least how approved organisations (e.g. an independent AMO) can identify an aircraft:</p> <ul style="list-style-type: none"> <li>- registered in a Member State for which the regulatory safety oversight has been delegated to a third country,</li> <li>- registered in a third country (and used by an EU operator), for which the regulatory safety oversight has been delegated to a Member State.</li> </ul> <p>It would also make sense to explain how to identify the functions and duties that have been delegated.</p> <p>It should also explain how industry (e.g. an independent AMO) can identify the authority of the State of Operator (e.g. to comply with point</p>	<p>Not accepted</p> <p>The proposed changes do not fall within the scope of this RMT; point M.1(3)(ii) only refers to the transfer between EU MSs of the responsibility for the approval of the maintenance programme.</p>



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
				<p>M.A.202), in particular with the new possibility for licensed air carriers in an airline group to regularly transfer aircraft from an AOC to another (as indicated in GM1 M.A.306(b)).</p> <p>The consequences of these transfers should also be explained:</p> <p>- now, in the AMC1 145.A.50(d):</p> <p>"The purpose of the certificate is to certify maintenance work carried out on assemblies/items/components/parts (hereafter referred to as 'item(s)'). It also allows the removal <del>from aircraft</del> of items in a 'serviceable' condition in accordance with AMC2 145.A.50(d) <b>from aircraft referred to in point (a) of Article 1 of this Regulation</b> in order to fit them to another aircraft/aircraft component. [...]"</p> <p>- at the next opportunity, in the Part-145 Appendix II (and in the Part-M Appendix IV):</p> <p>- "(d) A category A class rating means that the maintenance organisation may carry out maintenance on aircraft <b>referred to in point (a) of Article 1 of this Regulation</b> and</p>	



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
				<p>components (including engines and/or auxiliary power units (APUs)), in accordance with the aircraft maintenance data or, if agreed by the competent authority, in accordance with the component maintenance data, only while such components are fitted to the aircraft.</p> <p>- "(f) [...] A maintenance organisation that is approved with a category B class rating may also carry out maintenance on an installed engine during <del>aircraft</del> base and line maintenance <b>of aircraft referred to in point (a) of Article 1 of this Regulation</b>, provided that an appropriate control procedure in the MOE has been approved by the competent authority. [...]."</p> <p>- "(g) [...] A maintenance organisation that is approved with a category C class rating may also carry out maintenance on an installed component (other than a complete engine/APU) during <del>aircraft</del> base and line maintenance <b>of aircraft referred to in point (a) of Article 1 of this Regulation</b>, or at an engine/APU maintenance facility provided that an appropriate control procedure in the</p>	



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
				MOE has been approved by the competent authority. [...]."  - "(h) A category D class rating is a self-contained class rating that is not necessarily related to a specific aircraft referred to in point (a) of Article 1 of this Regulation, engine or other component for installation thereon."	
<b>Airbus</b>	3	AMC1 M.A.201(ea)	This AMC rather relates to the management system than technical measures and does not relate to the responsibilities of organisations.	Reidentify this AMC into an AMC to CAMO.A.200(e).	Not accepted  This AMC also applies to the operator that contracts the CAMO (as per point M.A.201); therefore, it should remain under the AMC to point M.A.201.
<b>Airbus</b>	4	AMC2 M.A.201(ea)	This AMC refers to the State of Registry: "[...] when the CAMO manages the continuing airworthiness of aircraft registered in different Member State(s) than its principal place of business".  Does the issue relate to the State of Registry or to the various languages used by the parties involved?  This AMC rather relates to organisational measures than technical ones and does not relate to the responsibilities of organisations.	Amend this AMC to read:  "[...] when the CAMO manages the continuing airworthiness of aircraft under the responsibility of parties using different languages."  Reidentify this AMC into an AMC to CAMO.A.200(e).	Not accepted  This AMC intends to include the CA of the MS of registry in the discussion about the choice of the language; it remains under the AMC to point M.A.201(ea) because it also affects the operators that are involved in an arrangement as per point M.A.201(ea).



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
Airbus	5	GM2 M.A.201(ea)	The first sentence of paragraph (b) does not relate to responsibilities, but to the management system.	Amend this AMC to read:  " <del>(b) Each approved organisation is responsible for its management system, even if they follow a common group standard, policies or procedures.</del> Accountability of each approved organisation as defined by the relevant EU regulation is not affected by being part of an air carrier business grouping. [...]"  Transfer the strikethrough sentence to an AMC to CAMO.A.200(e).	Not accepted  This sentence serves the purpose of clarifying the responsibilities of each organisation in respect of their management systems.
Airbus	6	GM1 CAMO.B.300(g)	Typo	Amend this sentence to read:  "(a) [...]"  (3) Meetings convened between the competent authority <del>ies</del> to ensure all remain informed of significant issues."	Accepted
Airbus	7	GM2 CAMO.B.300(g)	Typo	Amend this sentence to read:  "(b) To ensure cooperative oversight and sound decision-making regarding oversight across the single air carrier business grouping, the competent authorities involved <del>is</del> <b>are</b> expected to ensure that: [...]"	Accepted



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
<b>Airbus</b>	8	AMC/GM Regulation (EU) 965/2012	Replace inappropriate references to: - Regulation (EC) 2042/2003, - Part-M Subpart G and its points	Amend the following AMC/GM: - AMC1 ORO.AOC.110(c) - GM2 ORO.SPO.100(a) - AMC1 ORO.SPO.100(c)(1)	Noted  These aspects will be considered in future RMTs within the Air OPS domain.
<b>International Air Transport Association (IATA)</b>	1	GM M1.(3)(ii)(a)	It's good to clarify that approval of "this instance" AMP by the CAMO should be executed in conformance with (and taking advantage of) all privileges which the CAMO has - including "any indirect approval". This should be "the default" unless "the terms of delegation" - see GM M1.(3)(ii)(b) - specify anything different.	Consider the rewording as: In the case where the approval of the aircraft maintenance programme (AMP) is delegated to the competent authority of the member state where the CAMO is located, that AMP will benefit from any indirect approval privilege that CAMO might have unless specified otherwise by the terms of delegation referred to by GM M1.(3)(ii)(b)	Accepted  GM M1.(3)(ii)(a) was reworded accordingly.
<b>IATA</b>	2	GM M1.(3)(ii)	Is the wording "where the CAMO is located" used in GM M1.(3)(ii) clearly covering that used in M1.(3)(ii) or do we incur the risk of a more limited/restricted understanding of the enumerated "one of the following" mentioned in the latter?	Requiring clarification	Accepted  GM M1.(3)(ii)(a) was reworded to refer to the CA that is responsible for the CAMO/combined airworthiness organisation (CAO).
<b>IATA</b>	3	GM1 M.A.201(ea) point (b)	The wording at the end of this paragraph could be improved to clarify what is the expected "update" targeting: update of the documented list of participants (i.e. listed in contract or joint procedure)? ...update the participants regarding the management systems, group standards and changes?	Requiring clarification	Accepted  Clarification was provided.





Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
IATA	4	GM2 M.A.201(ea) point (a)	The use of wording like "...if such undertaking is fully consolidated" and "national-scale groups of undertakings" begets some definitions or clear understanding of the respective categorizations. Would such definitions exist or the understanding be accepted by all actors involved?	Requiring clarification	Accepted  The '... if such undertaking is fully consolidated' part was removed.  The wording of 'national-scale groups of undertakings' was modified to clarify the meaning of 'national-scale' as opposed to 'community-scale'.
IATA	5	GM3 M.A.201(ea) Responsibilities	While the illustrated examples are very useful, clarification is sought regarding the possibility of one operator of the business grouping to be the CAMO for a certain fleet type for several operators in the business grouping while the one operator is still subcontracting to another CAMO in the same business grouping the CAW management of another fleet type the one operator is flying. Such a scenario seems to be excluded by the wording in (a) since the operator either remains CAMO approved or contracts a CAMO and, additionally, points (b) and (c) introduce "possible examples" and "illustrate schematics that are not possible" without specifying that the respective lists are not exhaustive (or are they?)  Consider if the concept of CAMO approved or contracted should be clearly linked to the aircraft type; in other words the possibility of having an individual airline being "the CAMO" for a certain aircraft type for the whole business group while still contracting another CAMO in the group for a different aircraft type which the airline also operates.	Requiring clarification; suggest to introduce in GM3 M.A.201(ea) Responsibilities, as a heading (applicable to (a), (b), and (c)) the wording: "The text and illustrations below should be construed as referring to CAMO status for a single type of aircraft; independent combinations thereof, for several types of aircraft, should be considered applicable"	Partially accepted  GM3 M.A.201(ea) was modified to indicate that point M.A.201(ea)(c) is not exhaustive. However, an operator cannot contract one CAMO for one fleet and another CAMO for another fleet. This is not supported by point M.A.201(ea) and is clarified in its point (c).



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
IATA	5a		Is it correct to say that an airline operating several aircraft types can delegate to an external CAMO the CAW of one or several (up to all) of the aircraft types while preserving for its own CAMO (i.e. in-house) the CAW management of the remaining aircraft types.	Clarifying text needed to indicate that CAMO activity can be delgated in part (i.e. by aircraft type) or as a whole (i.e. all aircraft types).	Not accepted  See reply to IATA comment, Item No 5.
IATA	6	GM1 M.A.306(b) Aircraft technical log system	While this is a very good and necessary provision, it raises a question when stating "regularly transfer aircraft from one AOC to another in the group". The short-term interchange operation presently considered by ICAO (and EASA is a very active participant to / member of the respective ICAO WG), does not seem to contemplate transferring aircraft from one AOC document to another. Moreover, it seems there is no provision in the ICAO documentation regarding the limitation of one aircraft to a single AOC document at a given time (i.e. somehow similar to the uniqueness of aircraft registration - the aircraft could be only on one Register (SoR) at a time).	Suggest the wording "...to regularly transfer aircraft from operation by one AOC Holder to another AOC Holder in the group".	Partially accepted  The objective of point M.A.306(b) is not to transfer aircraft between AOCs, but between AOC holders. GM1 M.A.306(b) was clarified accordingly.
IATA	7	GM1 CAMO.B.300(g) Oversight principles (6)	Revise wording for reference to AOC for the reasons presented above	Suggested wording: "Specific oversight tasks, if any, to be carried out when aircraft operation is transferred from one AOC Holder to another one in the group"	Partially accepted  The objective of point CAMO.B.300(g) is not to transfer aircraft between AOCs, but between AOC holders. GM1 CAMO.B.300(g) was clarified accordingly.
IATA	8	GM2 CAMO.B.300(g) Oversight principles (b)	Typo / verb agreement	correct to say "...the competent authorities involved are expected to ensure..."	Accepted
IATA	9	GM1 CAMO.B.300(g) Oversight Principles (a) (2)	How is this updated when changes occur? Will each competent authority update its focal points when such changes occur?	Text similar to: Each authority should have a process to update all involved parties.	Partially accepted  The text was reworded to keep a reference to 'focal



Commenter	No	Document/paragraph/ chapter/point	Comment	Proposed change	EASA's response
					points', without naming them in the contract.
<b>Luftfahrt Bundesamt (LBA) of Germany</b>	1	GM1 CAMO.B.300(g)	It could be necessary that the authorities agree on the level of complexity of the business group or the involved parties	(b) Sharing of the oversight programme implemented by each competent authority (e.g. audit plan, programme especially regarding the oversight of the management system and <b>the assessment of the complexity of the organization</b>	Partially accepted  Part-CAMO and the related AMC & GM only refer to the complexity of the activities (as opposed to the complexity of the organisation); however, EASA agrees to add that element into point CAMO.B.300(b).
<b>LBA</b>	2	AMC2 CAMO.A.150 Findings	This AMC only describes the case that there is findings at the CAMO. It should also be described what should happen if there is a finding at the operator that effects the harmonised management system.	Add new AMC to ORO.GEN.150, e.g.  If a finding raised by the competent authority (or a non-compliance detected by the compliance monitoring function) affects the harmonisation of the management system with the management system of the contracted CAMO required by point M.A.201(ea), the Operator should inform the CAMO and the other associated operators to ensure proper actions are taken within the group. If the group use common standards to facilitate the harmonisation of the organisations management systems, the operator should inform the group management board or other similar integrated group governance body	Noted  These aspects will be considered in future RMTs under the 'Group Operation' initiative.

