EASA Part-CAMO Approvals – User Guide for Applicants

UG.CAMO.00017-001

<table>
<thead>
<tr>
<th>Name</th>
<th>Validation</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prepared by:</td>
<td>Alessandro Zanuzzi</td>
<td>Validated</td>
</tr>
<tr>
<td>Verified by:</td>
<td>Raffaele Iovinella</td>
<td>Validated</td>
</tr>
<tr>
<td>Reviewed by:</td>
<td>Dominique Perron</td>
<td>Validated</td>
</tr>
<tr>
<td>Approved by:</td>
<td>Karl Specht</td>
<td>Validated</td>
</tr>
</tbody>
</table>
**DOCUMENT CONTROL SHEET**

**Reference documents**

**a) Contextual documents**

Applicable regulations are listed in the form “FO.CAMO.00009 – EASA Part-CAMO Approvals – Documentation Index” last revision.

- PR.ORG.00001 – Organisation application management
- PR.ORG.00002 – Organisation approval technical investigation
- PR.ORG.00003 – Organisation approval audit
- PR.ORG.00004 – Organisation surveillance
- PR.ORG.00005 – Non compliance management for organisation approval
- PR.ORG.00007 – Processing of article 65 transfer request

**b) Internal documents**

Applicable documents are listed in the form “FO.CAMO.00009 – EASA Part-CAMO Approvals – Documentation Index” last revision.

- FO.CAMO.00015 – Part-CAMO Approval Recommendation Report - Form 13-CAMO
- FO.CAMO.00016 – Continuing Airworthiness Management Organisation Certificate - Form 14

**Log of issues**

<table>
<thead>
<tr>
<th>Issue</th>
<th>Issue date</th>
<th>Change description</th>
</tr>
</thead>
<tbody>
<tr>
<td>001</td>
<td>12/10/2023</td>
<td>First issue. Migration and adaptation of the User Guide UG.CAO.00062-001 from FS.1.4 to FS.1.2. UG.CAO.00062-001 contextually deleted.</td>
</tr>
</tbody>
</table>
0 Introduction
0.1 Table of Contents

0 Introduction ........................................................................................................................................... 3

0.1 Table of Contents .................................................................................................................................. 4

0.2 Definitions and Abbreviations ............................................................................................................... 6

0.3 Responsibility and applicability .......................................................................................................... 7

0.4 Purpose ................................................................................................................................................ 7

0.5 Associated instructions .......................................................................................................................... 7

0.6 Communication .................................................................................................................................... 7

1 Responsibilities and Pre-requisites ........................................................................................................ 8

1.1 Responsibilities .................................................................................................................................... 9

1.1.1 Management of approvals with an Oversight Management Software ........................................... 9

2 Transfer of existing CAMO oversight from a National Aviation Authority to EASA as Competent Authority .......................................................................................................................... 10

2.1 General ................................................................................................................................................ 11

2.1.1 Aircraft Maintenance Programme ................................................................................................. 11

2.2 Team Leader Appointment .................................................................................................................. 11

2.3 Data, archives and documentation to the Agency ............................................................................... 12

2.4 Transfer Process of CAMO certificates and recommendations ....................................................... 12

2.5 Determination of start of the oversight planning cycle ....................................................................... 13

3 Initial Approval ....................................................................................................................................... 14

3.1 Allocation Process ................................................................................................................................ 15

3.1.1 Application ...................................................................................................................................... 15

3.1.2 Evaluation of the required number of visits and number of assigned team members .................. 15

3.2 Documentation Review ....................................................................................................................... 15

3.2.1 Continuing Airworthiness Management Exposition .......................................................................... 15

3.2.2 Management Personnel .................................................................................................................. 16

3.2.3 Aircraft Maintenance Programme .................................................................................................. 16

3.2.4 Internal Pre-Audit .............................................................................................................................. 16

3.3 Audit ................................................................................................................................................... 16

3.3.1 Audit Preparation .............................................................................................................................. 16

3.3.2 Audit Performance ........................................................................................................................... 17

3.3.3 Specific Requirements for Initial Audit ............................................................................................ 17

3.3.4 Specific requirements for audit of subcontractors .......................................................................... 17

3.4 Audit Report and findings notification ................................................................................................. 17

3.5 Findings follow-up ............................................................................................................................... 18

3.6 Issuance of an Approval ....................................................................................................................... 18

4 Changes requiring prior approval ........................................................................................................ 19

4.1 Application for Change ......................................................................................................................... 20

4.2 Documentation Review ....................................................................................................................... 20

4.2.1 CAME ............................................................................................................................................. 20

4.2.2 Management Personnel ................................................................................................................... 20

4.2.3 Internal pre-audit ............................................................................................................................ 20

4.2.4 Change risk assessment .................................................................................................................. 20

4.3 Audit ................................................................................................................................................... 20

4.3.1 Audit Performance ........................................................................................................................... 21

4.4 Audit Report and findings notification ............................................................................................... 21

4.5 Findings follow-up ............................................................................................................................... 21

4.6 Issuance of a Change to a Part-CAMO Approval .............................................................................. 21
5 Continued Surveillance ................................................................................................................... 22
  5.1 General requirements ............................................................................................................. 23
  5.2 Continuing Oversight activities .............................................................................................. 23
  5.3 Audit ....................................................................................................................................... 23
      5.3.1 Audit Performance ........................................................................................................... 23
  5.4 Audit Report and findings notification ...................................................................................... 23
  5.5 Findings follow-up .................................................................................................................. 24
      5.5.1 Level 2 Findings ............................................................................................................. 24
      5.5.2 Level 1 Findings ............................................................................................................. 24
      5.5.3 Closure of findings ......................................................................................................... 24

6 Surrender ..................................................................................................................................... 26
  6.1 Notification to EASA .............................................................................................................. 27
  6.2 EASA confirmation .................................................................................................................. 27
  6.3 CAMO obligations ................................................................................................................... 27

7 Limitation, Suspension and Revocation ....................................................................................... 28

8 Changes not requiring prior approval .......................................................................................... 31
  8.1 Regulatory Background .......................................................................................................... 32
  8.2 Procedure content ................................................................................................................... 32
  8.3 Access to and notification of revised documents ..................................................................... 32
  8.4 Change assessment procedure .............................................................................................. 32

9 General Timeframes .................................................................................................................... 33
  9.1 Timeframe for an Initial Part-CAMO Approval (for reference only) ....................................... 34
  9.2 Timeframe for Continuation of Part-CAMO Approval (for reference only) ............................ 34
## Definitions and Abbreviations

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>AMC</td>
<td>ACCEPTABLE MEANS OF COMPLIANCE</td>
</tr>
<tr>
<td>AMP</td>
<td>AIRCRAFT MAINTENANCE PROGRAMME</td>
</tr>
<tr>
<td>AMTO</td>
<td>APPROVED MAINTENANCE TRAINING ORGANISATION</td>
</tr>
<tr>
<td>CAMO</td>
<td>CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION</td>
</tr>
<tr>
<td>CAMO COORDINATOR</td>
<td>CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION COORDINATOR</td>
</tr>
<tr>
<td>CAO</td>
<td>CONTINUING AIRWORTHINESS ORGANISATION</td>
</tr>
<tr>
<td>CAP</td>
<td>CORRECTIVE ACTION PLAN</td>
</tr>
<tr>
<td>EASA</td>
<td>EUROPEAN UNION AVIATION SAFETY AGENCY</td>
</tr>
<tr>
<td>EU</td>
<td>EUROPEAN UNION</td>
</tr>
<tr>
<td>GM</td>
<td>GUIDANCE MATERIAL</td>
</tr>
<tr>
<td>MS</td>
<td>MANAGEMENT SYSTEM</td>
</tr>
<tr>
<td>NAA</td>
<td>NATIONAL AVIATION AUTHORITY</td>
</tr>
<tr>
<td>OMS</td>
<td>ORGANISATION MANAGEMENT SOFTWARE</td>
</tr>
<tr>
<td>QA</td>
<td>QUALITY ASSURANCE MANAGER</td>
</tr>
<tr>
<td>QE</td>
<td>QUALIFIED ENTITY</td>
</tr>
<tr>
<td>RBO</td>
<td>RISK BASED OVERSIGHT</td>
</tr>
<tr>
<td>SDM</td>
<td>SAFETY DATA MANAGEMENT</td>
</tr>
<tr>
<td>SM</td>
<td>SAFETY MANAGER</td>
</tr>
<tr>
<td>SMS</td>
<td>SAFETY MANAGEMENT SYSTEM</td>
</tr>
<tr>
<td>TL</td>
<td>TEAM LEADER</td>
</tr>
<tr>
<td>TM</td>
<td>TEAM MEMBER</td>
</tr>
<tr>
<td>WH</td>
<td>WORKING HOURS</td>
</tr>
</tbody>
</table>
0.3 Responsibility and applicability
Pursuant to Commission Regulation (EU) 1321/2014 applicable requirements, EASA is the responsible Competent Authority for the tasks related to certification, oversight and enforcement of continuing airworthiness, maintenance and maintenance training organisations (AMO, AMTO, CAO and CAMO) whose principal place of business is located outside the EU.

Furthermore Articles 64 and 65 of Regulation (EU) 2018/1139 (Basic Regulation) allow EASA, under certain conditions therein defined, to be (re)allocated those responsibilities with respect to one or more organisations holding above mentioned approvals from one or more Member States.

EASA is therefore responsible for the final approval of these organisations and for establishing procedures detailing how applications and approvals are managed.

This User Guide is applicable to EASA Part-CAMO applicants and EASA Part-CAMO organisations (hereafter called “CAMO” or “organisation”) falling into the two above mentioned categories.

This User Guide is not applicable to continuing airworthiness organisations having their principal place of business located outside the EU Member States AND which are certified under the provisions of a bilateral agreement signed with the EU.

The provisions of this User Guide are complementary to the requirements laid down in the applicable Annex of Commission Regulation (EU) 1321/2014 “as amended” and does not supersede or replace the associated regulatory requirements.

0.4 Purpose
The purpose of this User Guide is to describe how the Organisation should proceed when applying for a Part-CAMO Approval and how EASA will handle the Initial Investigation, Continuation, Change, Limitation, Suspension or Revocation of the Approval of the aforementioned organisation according to the applicable Annex of Commission Regulation (EU) 1321/2014 “as amended”.

0.5 Associated instructions
EASA has developed associated instructions (User Guides, Forms, Templates and Work Instructions), detailing specific matters, which have to be considered as an integral part of this User Guide.

A complete listing of these documents, together with their applicability to the CAMOs or NAA/QE/EASA, is addressed in the current revision of the FO.CAMO.00009 “EASA Part-CAMO Approvals – Documentation Index”.

Documents which are applicable to both EASA and CAMO’s are made available on the EASA Web Site (http://www.easa.europa.eu).

Note: Each time a cross reference is provided to another document or another chapter/paragraph of the same document, this reference is identified with grey text.

0.6 Communication
All documents and correspondences between the organisation, the accredited NAA/QE and EASA will be in the English language unless otherwise agreed by EASA.
1 Responsibilities and Pre-requisites
1.1 Responsibilities

Under the Aircraft Maintenance & CAMO (FS.1.2) Section Manager responsibility, the Senior Expert – CAMO is designated as Continuing Airworthiness Management Organisation Coordinator (CAMOC) and is responsible for management and planning of the activities related to the Part-CAMO Approvals. The CAMOC conducts these activities with the support of the deputy CAMOC (if this role is assigned) and in coordination with assigned Team Leader (TL)/Team Members (TM)/Inspectors.

In this User Guide, unless otherwise specified, any qualified person assigned to the performance of an oversight task, being TL or TM, is generically defined as Inspector.

1.1.1 Management of approvals with an Oversight Management Software

The oversight of Part-CAMO Approvals is managed with a dedicated software, referred to in this document as OMS (Oversight Management Software). The OMS is being used for the management of approvals, including issuance of recommendations and findings management.

The related OMS procedure will be identified as indicated below:
2 Transfer of existing CAMO oversight from a National Aviation Authority to EASA as Competent Authority
2.1 General
A transfer of a Part-CAMO Approval oversight responsibility may occur in two different cases:

1) In accordance with Article 64 of Regulation (EU) 2018/1139, a Member State may request the Agency to carry out the tasks related to certification, oversight and enforcement referred to in Article 62(2) with respect to any or all natural and legal persons and aircraft [...] for which the Member State concerned is responsible under this Regulation and the delegated and implementing acts adopted on the basis thereof.

2) In accordance with Article 65 of Regulation (EU) 2018/1139, an organisation may request that the European Union Safety Agency acts – by way of derogation from Article 62 (4) of that regulation – as the Competent Authority responsible for the tasks related to certification, oversight and enforcement with respect to that organisation, where that organisation holds a certificate or is eligible to apply for a certificate in accordance with Chapter III to the national Competent Authority from one Member State, but it has or it intends to have a substantial proportion of facilities and personnel covered by that certificate located in one or more other Member States.

In both cases, the applicant either holds a valid Continuing Airworthiness Management Organisation (CAMO) approval issued by the Competent Authority of an EASA Member State where the applicant has its Principal Place of Business or intends to apply for an initial certification of such an approval.

The process begins when EASA has confirmed the eligibility and has formally accepted with the concerned NAA(s) the request for transfer under the Art. 64 or Art. 65. A Transfer Agreement will then be established and signed by the Agency and the concerned NAA(s).

EASA will become the Competent Authority responsible for the Part-CAMO Approval and the transferring NAA(s) will be relieved for the responsibility for the related tasks once the organisation surrendered to the NAA(s) the national certificates and EASA has reissued those certificates to the organisation in its own name. This will take place within an agreed and defined time after entry into force of the Transfer Agreement and herein defined.

For an initial certification of an EASA Part-CAMO Approval, once the Transfer Agreement enters into force, the process follows the steps detailed in Chapter 3 of this User Guide.

2.1.1 Aircraft Maintenance Programme
The State of Registry Competent Authority(ies) of the aircraft managed by the transferred CAMO, in accordance with Commission Regulation (EU) 1321/2014 Annex I (Part-M), Section General, M.1 paragraph 3(ii) may decide to reallocate to the Agency also the responsibility for the approval of the Aircraft Maintenance Programme(s) (AMP) of those aircraft.

In this case the reallocation of such responsibility is formalised either within the Transfer Agreement or through a dedicated letter.

2.2 Team Leader Appointment
The FS.1.2 Section Manager with the support of the CAMOC will nominate amongst the FS.1.2 experts a Team Leader (TL) in charge of the organisation.

The TL will coordinate the transfer of the Part-CAMO Approval and in case the CAMO is connected to the transfer of an AOC to EASA under the provisions of Article 65 of the Basic Regulation, will cooperate with the nominated focal point of the EASA Air Operator Section (FS.2.3).
2.3 Data, archives and documentation to the Agency

Before the applicability date of the transfer, some data, archives and documents must be handed over to the Agency. The TL will establish a list of documents to be transferred. This will be discussed with the transferring NAA(s) and the CAMO, and will be added to the Transfer Agreement.

The below list is not exhaustive, but it is indicative to the level of scrutiny necessary. Some information will be transferred directly by the transferring NAA(s) and others by the organisation:

- Part-CAMO Approval Certificate.
- Non-compliances detected by the NAA in the last 24 months of surveillance.
- Copy of all findings raised by the NAA against the CAMO, which were open up to the date of signature of the Transfer Agreement.
- Copy of the latest Oversight Programme covering the activities transferred, and detailing the planned and achieved oversight activities, and including, where available, the description of the risk profile of the organisation.
- Minimum Equipment List (including RIE for the past 24 months, if applicable).
- Aircraft Maintenance Programmes (including deferred maintenance requested for in the past 24 months, if applicable).
- Any Art. 70 “Reaction to a safety problem” issued in the past 24 months.
- Any Art. 71 granted exemptions or AltMoC approved in the past 24 months or in any case still in force.
- Overview of Occurrence Reports for the past 24 months related to continuing airworthiness (including any investigation still on-going).
- Continuing Airworthiness Management Exposition and associated procedures and lists.
- Aircraft Tech Log(s).
- SMS Manual (if available).
- Safety Review Board Meeting minutes of last 2 years.
- Last updated CAMO Risk Register.
- Copy of contracts with operators for contracted CAMO activities under Part-M.A.201 (ea)3 (One CAMO).
- Reliability Reports of the last 2 years.
- Maintenance Contracts with maintenance providers.
- Copy of contracts for subcontracted activities.
- Management personnel, ARC staff: personal technical files.
- Aircraft manufacturer website access to the customised operational and airworthiness related documents.

In addition, some CAMO’s archived data and documents will be kept, for the duration of the transfer, at the NAA and will be made available upon EASA’s request:

- NAA Inspectors manual, procedures and checklists.

2.4 Transfer Process of CAMO certificates and recommendations

All certificates foreseen by the Basic Regulation (EU) 2018/1139 and its implementing rules issued by EASA, EASA Member States and organisations approved by EASA or EASA Member States, benefit from mutual recognition in accordance with Article 11.1 of the Basic Regulation.

Therefore the transfer of certificates is considered as a pure administrative act, limited to the issuance of the Part-CAMO Approval (including applicable exemptions under Regulation (EU) 2018/1139, Art. 71), under the EASA templates, indicating EASA as Competent Authority.

Consequently, any transfer of responsibility under Art. 64 or Art. 65 of an existing and valid Part-CAMO Approval will be based on this mutual recognition principle. Therefore, no initial certification investigation is necessary.
An agency of the European Union

The initial issuance of the EASA certificates will be limited in the scope of activity, the authorised aircraft type(s), privileges and the specific operations previously granted by the transferring NAA. Only the necessary administrative changes (e.g. Competent Authority, coordination processes) will be changed as requested by EASA.

Any other changes will be considered as a variation of the Part-CAMO Approval and will be treated as such after the transfer.

In case the Part-CAMO Approval transferred to EASA is linked to an AOC under the oversight of one or more Member State(s) Competent Authority(ies) (e.g. as business group CAMO under Part-M.A.201(ea) provisions), the necessary coordination/cooperation activities during the the Transfer/Initial Approval/Oversight will be detailed in the relevant Interface Procedure document.

2.5 Determination of start of the oversight planning cycle
For Initial Approvals issued by the Agency the cycle starts from the issue date of the Initial Approval certificate.
For existing Part-CAMO Approvals reallocated to the Agency pursuant to the application of Art. 64 or Art. 65 of the Basic Regulation, the duration of the cycle will be kept through the transfer.
3 Initial Approval
3.1 Allocation Process

3.1.1 Application
The organisation will have to prepare a new application for an EASA Part-CAMO Approval using a FO.CAMO.00013 “EASA Form 2-CAMO”, compiled in accordance to the WI.CAMO.00014 “EASA Form 2-CAMO instructions”. This application form will have to be sent directly to EASA by e-mail to: CAMO@easa.europa.eu.

Details about the EASA’s Regulations, including Fees and Charges, can be found on the EASA website (www.easa.europa.eu).

EASA Applicant Relations Section will check the application. When incorrect or incomplete information is supplied, EASA Applicant Relations Section will notify the applicant as soon as possible by letter or email detailing the omissions and errors. In case of refusal of an application, EASA Applicant Relations Section will notify this decision in writing to the applicant together with the reasons thereto.

Initial application package must include:
- The FO.CAMO.00013 “EASA Form 2-CAMO”.
- The Certificate of Incorporation/Business Registration (or similar legal document) as detailed on the FO.CAMO.00013 “EASA Form 2-CAMO”, with a translation in English when necessary.

Upon receipt of an initial application by the EASA Applicant Relations Section, the EASA CAMOC carries out the eligibility check of the application.

When eligibility has been fully assessed, EASA Applicant Relations Section calculates the fees according to the current Fees and Charges Regulation and sends information to the applicant for review and acceptance.

3.1.2 Evaluation of the required number of visits and number of assigned team members
The determination of the required number of visits and number of assigned Inspectors for an Initial Approval is established by the EASA CAMOC based on the information available at the time of application.

3.2 Documentation Review

3.2.1 Continuing Airworthiness Management Exposition
According to CAMO.B.310(e)(2), the Competent Authority will formally approve the initial issue of the Continuing Airworthiness Management Exposition (CAME) including associated list(s) and procedure(s) as applicable. As a consequence, before any investigation (audit), the assigned Inspector will verify the compliance of those documents with Part-CAMO by using the relevant EASA instructions as reference material, i.e. UG.CAMO.00004 “EASA Part-CAMO Approvals - User Guide for CAME (CAMO-AOC)”, published on the EASA website (www.easa.europa.eu). This User Guide can also be used by the organisation to draft the CAME.

When the proposed exposition is not acceptable due to a large number of non compliances with Part-CAMO requirements and EASA instructions, the assigned Inspector will stop the review and send the draft of the CAME back to the organisation. The organisation will have to re-draft the CAME in accordance with the relevant EASA instruction.

Where the organisation still fails to provide acceptable documents (CAME, Associated lists, procedures, ..) after several exchanges, the assigned Inspector will liaise with the EASA CAMOC to determine the most appropriate action including termination of the application.
3.2.2 Management Personnel

CAMO.B.310 does not mandate the formal notification of acceptance of the Management Personnel required under CAMO.A.305 and CAMO.A.306, and their acceptance is formalised through the approval of the CAME.

The compliance of this personnel with the applicable requirement is assessed using the relevant UG.CAMO.00006 “EASA Part-CAMO Approvals - User Guide for Nominated Personnel” as reference material.

3.2.3 Aircraft Maintenance Programme

The organisation will ensure that aircraft under its control are maintained to an approved Aircraft Maintenance Programme (AMP) for each type of aircraft for which they provide continuing airworthiness management. The Maintenance Programme will be approved in accordance with Part-M.1.3.

In case the AMP is approved by the NAA of the State of Registry, the organisation will be requested to provide evidence to EASA that all the Maintenance Programmes, and any amendments, have been approved.

In case the AMP is approved by the Agency, EASA has issued the UG.CAMO.00010 “User Guide for Aircraft Maintenance Programmes (AMP) approvals” and the associated TE.CAMO.00011 “Aircraft Maintenance Programme (AMP) Compliance Checklist”, published on the EASA website (www.easa.europa.eu), which should be used by the organisation for the preparation of the draft Maintenance Programme to be presented for approval.

3.2.4 Internal Pre-Audit

An internal pre-audit in accordance with CAMO.A.115(b)1 will be performed by the organisation to verify that processes, facilities, documentation, personnel and subcontractors if any, subject to the application have been reviewed and audited showing compliance with all applicable EASA Part-M and/or Part-CAMO requirements.

All findings raised during this internal audit must have been closed with appropriate corrective actions before the EASA audit takes place.

The corresponding audit report(s) including the associated corrective actions will be provided by the organisation to the assigned Inspector.

3.3 Audit

Once the draft of the CAME, the associated/supporting documents (including AMP approvals, as applicable), the pre-audit report, are deemed acceptable, the assigned Inspector initiates the investigation in accordance with Section B of Part-CAMO and its associated Acceptable Means of Compliance (AMC)/Guidance Material (GM) and relevant procedures.

In addition, all relevant EASA instructions dealing with specific technical matters (i.e. Airworthiness Review Process, Aircraft Maintenance Programme, etc.) as applicable to the specific CAMO, will be used as reference.

3.3.1 Audit Preparation

The organisation’s focal point will be provided by the TL with an audit programme, intended to maximise the efficiency and minimise the impact of the inspection on the daily work of the CAMO.

This programme:

- Identifies the number of Inspectors involved each day.
- Informs the Part-CAMO Approval holder regarding which member/s of staff would be required to be present for which phase of the inspection.
• Foresees specific time at the end of each day to inform the Part-CAMO Approval holder of the progress of the inspection and to provide the Part-CAMO Approval holder with an opportunity to respond to any issues raised.
• Foresees enough time after the audit for the team to review the results of the day and prepare the schedule for the next day.

### 3.3.2 Audit Performance

An opening meeting will be held with the organisation management, covering at least the following aspects:

- Confirmation of the audit schedule including the scope of the audit and the aircraft visit(s) (only on-site audit).
- Confirmation of the required interviews / availability of the people involved organisation’s process.
- Explanation on the method used for reporting non-conformities and dealing with findings.
- Confirmation of the applicable regulation and standards.

All information relevant to the audit objectives, scope and criteria will be collected by appropriate sampling (through interviews, observation of activities, review of documents and records) and verified.

The audit evidence will be evaluated against the audit objectives and references in order to determine findings. The audit team will review the findings at appropriate stages of the audit with the organisation’s personnel in order to prevent any future misunderstanding.

A closing meeting, chaired by the audit TL will be held to present the audit findings and the conclusions to the organisation management in order to ensure that they are understood and accepted. The organisation will be given the opportunity to discuss any non-compliance and timeframes.

### 3.3.3 Specific Requirements for Initial Audit

According to CAMO.B.310(b), the assigned Inspector will hold a meeting with the Accountable Manager at least once during the investigation for initial Part-CAMO Approval to ensure their responsibilities under Part-CAMO are well understood.

In addition to the above, when the organisation is located in an EU Member State and has applied for Airworthiness Review privilege in accordance with CAMO.A.125(e), the initial audit will include an assessment of the proposed Airworthiness Review Staff by completing an Airworthiness Review under supervision, as required by CAMO.A.310(c).

Issuance of Permit to Fly privilege as described in CAMO.A.125(f) can only be granted to organisations holding Airworthiness Review authorisation.

### 3.3.4 Specific requirements for audit of subcontractors

When the organisation makes use of subcontractors to manage the continuing airworthiness of aircraft, those subcontractors will be audited as part of the Initial Approval process and thereafter during the surveillance cycle. The assigned Inspector will always be accompanied throughout the subcontractors audit by a senior person of the CAMO.

### 3.4 Audit Report and findings notification

The organisation should be provided with a draft audit report by the audit TL at the closing meeting. In case this is not possible for any reason (i.e. due to time constrains, etc.), the audit TL will in any case debrief clearly the organisation
during the closing meeting about the number of findings, their due dates, plus a description of each finding raised against the applicable requirement.

The audit report is made of the applicable elements of the FO.CAMO.00015 “EASA Form 13-CAMO”. Different formats of the audit reports may be used by EASA/NAAs provided they contain same level of information.

The formal notification of the findings is sent to the organisation within a maximum of 15 calendar days from the end of the audit.

### Approvals in OMS

The audit report, findings and observations as applicable, are notified through the OMS using an electronic workflow. At any time, the system allows to verify if a workflow is under the responsibility of the assigned Inspector (e.g. findings to be still notified) or if it is under the responsibility of the organisation (e.g. finding corrective action in progress).

### 3.5 Findings follow-up

For an initial audit the findings are not classified as Level 1 or Level 2 as the organisation is not yet approved. A maximum of three months is allowed to take corrective action for each finding raised during the initial audit.

In case the organisation is unable to complete the corrective actions within the established three months, an extension request, which may be granted up to a maximum of other three months, will have to be submitted to the assigned Inspector. Failure to comply within the timescale granted, could lead EASA to terminate the application.

Depending on the extent and nature of the findings and the delay of corrective actions implementation, additional audit(s) may be necessary.

Once the organisation’s compliance with Part-CAMO has been established, the assigned Inspector will make a recommendation to EASA to issue the EASA Part-CAMO Approval.

**Note:** In the case it appears necessary to adjust the requested scope of approval, then the organisation will have to re-issue a FO.CAMO.00013 “EASA Form 2-CAMO” reflecting the scope of approval to be recommended. The last version of the FO.CAMO.00013 “EASA Form 2-CAMO” will have to match the scope of approval recommended by the assigned Inspector.

### 3.6 Issuance of an Approval

The recommendation will be reviewed by EASA for compliance and accuracy. Once satisfied, the following documents will be issued by EASA and sent to the organisation:

- The FO.CAMO.00016 “EASA Form 14” Certificate.
- The Approval Letter of the CAME (which includes acceptance of nominated persons), together with its associated document(s) and list(s).
- The Approval Letter(s) of the AMP(s), as applicable.
4 Changes requiring prior approval
4.1 Application for Change

The organisation will have to prepare an application for a Change to an EASA Part-CAMO Approval using a FO.CAMO.00013 “EASA Form 2-CAMO”, compiled in accordance to the WI.CAMO.00014 “EASA Form 2-CAMO instructions”. This application form will have to be sent directly to EASA by e-mail to: CAMO@easa.europa.eu. Details about the EASA’s Regulations, including Fees and Charges, can be found on the EASA website (www.easa.europa.eu).

Upon receipt of the application by the EASA Applicant Relations Section, the EASA CAMOC carries out its technical eligibility check. When satisfied, the EASA CAMOC sends the application package to the allocated TL who will review the Change request to evaluate if it requires the EASA prior approval before its implementation or not (for the second case, refer to Chapter 8 of this User Guide).

4.2 Documentation Review

4.2.1 CAME

According to CAMO.B.330 and associated AMC’s, the Competent Authority will formally approve certain Changes to the exposition and the associated list(s) and procedure(s) as applicable. As a consequence, before planning any activity, the TL will verify that all new procedures introduced by the Change in the proposed Exposition and/or the associated list(s) and procedure(s) are in compliance with EASA Part-M or Part-CAMO using the relevant EASA instructions as reference material.

4.2.2 Management Personnel

The same process as the Initial Approval process will be applied except for the interview of the proposed managers, which could be done differently. Refer to the UG.CAMO.00006 “EASA Part-CAMO Approvals - User Guide for Nominated Personnel” for further details.

4.2.3 Internal pre-audit

The same process as the Initial Approval process will be applied.

4.2.4 Change risk assessment

The organisation will have to manage the safety risks related to any Changes to the organisation in accordance with AMC1 CAMO.A.200(a)(3) point (e). For Changes requiring prior approval, the organisation will have to conduct a risk assessment and provide it to the assigned TL.

4.3 Audit

Once the draft of the CAME, the associated documents, the Compliance Monitoring Manager statement and the internal audit report are deemed acceptable, the assigned Inspector initiates the investigation in accordance with Section B of Part-CAMO and all the associated AMC’s/GM’s.

The decision to consider the audit methodology is based on the complexity and inherent risk of the Change. In all cases the following general principles apply:

- All previous Level 2 findings which could be linked to the requested Change must be closed.
- The organisation will provide the assigned Inspector with evidence that the regulatory requirements (particularly in terms of staff, facilities, documentation) have been internally audited and found satisfactory.
This could be completed by providing as necessary the assigned Inspector with evidence such as but not limited to:

- List of procedures applicable to the required Change.
- Internal audit reports regarding the requested Change.
- Internal follow up and implementation of corrective actions.

### 4.3.1 Audit Performance

The same process as the Initial Approval process will be applied.

### 4.4 Audit Report and findings notification

The same process as the Initial Approval process will be applied.

However, in case the assigned Inspector identifies findings not related to the Change but impacting the current Part-CAMO Approval, these will be managed as described in paragraphs 5.4 of this User Guide and recorded in a dedicated surveillance phase audit activity.

### 4.5 Findings follow-up

The same process as the Initial Approval process will be applied.

### 4.6 Issuance of a Change to a Part-CAMO Approval

The same process as the Initial Approval process will be applied.
5 Continued Surveillance
5.1 General requirements
Regulation (EU) No 1321/2014 requires Competent Authorities to verify continued compliance of approval holders with the applicable requirements of Regulations (EU) 2018/1139 and No 1321/2014, in order to monitor their continued competence to conduct safe operations in compliance with the applicable requirements.

This verification will be based on audits and inspections, conducted in accordance with an Oversight Programme taking into account the specific nature of the organisation, the complexity of its activities, the results of past certification and/or oversight activities and based on the assessment of associated risks.

The Oversight Programme defines duration (oversight planning cycle), number of hours, team size and schedule of oversight activities (audits, inspections, un-announced inspections and meetings with the Accountable Manager, including details of product audits, subcontractors audits and locations, as appropriate). The Oversight Programme is established after the Initial Approval and then at the end of each surveillance cycle.

During the surveillance cycle, each organisation must be completely reviewed for compliance to Part-CAMO and the Accountable Manager will be met at least once during the cycle.

5.2 Continuing Oversight activities
In addition to the standard oversight activities, such as audits, inspections and meetings, defined in numbers and scope in the Oversight Programme and for whose preparation and execution the same guidelines of the Initial Approval process will be followed, there are a number of additional activities which are an integral part of the oversight, such as:

- Attendance to reliability meetings.
- Attendance to safety review board meetings.
- SACA/SAFA reports review.
- Mandatory and voluntary occurrence reports review and follow up.
- Changes not requiring prior approval (refer to Chapter 8 of this User Guide for additional details).

5.3 Audit
Desktop and on-site/remote audit activities will be performed following the same process as the Initial Approval process.

5.3.1 Audit Performance
The same process as the Initial Approval process will be applied.

5.4 Audit Report and findings notification
The findings identified by the assigned Inspector will be classified in accordance with CAMO.B.305.

The organisation should be provided with a draft audit report by the audit TL at the closing meeting. In case this is not possible for any reason (i.e. due to time constrains, etc.), the audit TL will in any case debrief clearly the organisation during the closing meeting about the number of findings, their due dates, plus a description of each finding raised against the applicable requirement.

Should a potential Level 1 finding against any applicable Part-M or Part-CAMO requirement which lowers the safety standard and hazards seriously the flight safety be identified, the assigned Inspector will immediately liaise with EASA to confirm the classification of the finding and will not transmit any audit report to the organisation.
The audit report, findings and observations as applicable, are notified through the OMS using an electronic workflow. At any time, the system allows to verify if a workflow is under the responsibility of the assigned Inspector (e.g. findings to be still notified) or if it is under the responsibility of the organisation (e.g. finding corrective action in progress).

5.5 Findings follow-up

It is the responsibility of the organisation to follow up both Level 1 and Level 2 findings for corrective actions within the agreed due dates and also to implement any additional limits imposed by EASA, addressed in the Suspension/Limitation notification letter.

The process to follow-up the Level 2 and Level 1 findings is described in the subsequent paragraphs.

5.5.1 Level 2 Findings

The organisation will have to provide the assigned Inspector with:

- An acknowledgement of the findings, a high level action plan and a confirmation that a root cause analysis has been started together with the associated proposed timescales, within 15 days after the receipt of the finding notification or within the finding due date, whichever is the earlier date.
- Corrective action evidences as per the agreed corrective action plan and in any case at least 15 days in advance of the finding due date, to allow the review by the assigned Inspector within the finding due date.

Any extension to the initial due date will have to be justified and requested in writing or through the OMS before the finding due date by the organisation to the assigned Inspector. Such an extension should not be systematically granted and cannot exceed three additional months. Before extending the initial period, the assigned Inspector must be satisfied with a corrective action plan provided by the organisation.

According to CAMO.B.350(d)(3), where an organisation fails to submit an acceptable corrective action plan, or to perform the corrective action within the time period accepted or extended by EASA, the finding will be raised to Level 1 and actions taken as laid down in point CAMO.B.350(d)(1).

5.5.2 Level 1 Findings

When the Level 1 finding is confirmed, EASA will formally notify the audit report to the organisation together with the decision against the approval in line with CAMO.B.350 and CAMO.B.355.

It is the responsibility of the organisation to take the appropriate and immediate corrective action.

Should EASA not confirm the suspected Level 1, the standard process of finding notification will continue and the assigned Inspector will send normally the audit report to the organisation.

5.5.3 Closure of findings

Once the assigned Inspector is satisfied that the corrective actions proposed by the organisation have been adequately implemented, the organisation is notified in writing that the proposed corrective actions are considered to be acceptable and/or findings are closed.
Findings management, including acceptance/rejection and extension of corrective actions is managed electronically with working flows.
6 Surrender
6.1 **Notification to EASA**

If the organisation intends to surrender the Part-CAMO Approval, a dedicated FO.CAMO.00013 “EASA Form 2-CAMO” will have to be submitted to EASA and compiled in accordance to the WI.CAMO.00014-001 “EASA Form 2-CAMO Instructions”. This application form will have to be sent directly to EASA by e-mail to: CAMO@easa.europa.eu.

Alternative methods to surrender an approval can be accepted, such as statements issued by the Accountable Manager or a legal representative in case of bankruptcy.

6.2 **EASA confirmation**

Based upon the FO.CAMO.00013 “EASA Form 2-CAMO”, EASA will formally notify the approval holder about the surrender of its Part-CAMO Approval.

At the same time, EASA Applicant Relations Section will process any outstanding payment/recovery according the current Fees and Charges Regulation. In addition, any fee not consumed will be reimbursed.

6.3 **CAMO obligations**

In the case of surrender, the organisation has the following obligations:

- According to CAMO.A.220(a)(6), where an organisation approved under Part-CAMO terminates its operation, all retained aircraft records covering the last three years will have to be transferred to the owner or customer of the respective aircraft or component.
- According to CAMO.A.135(d), the Part-CAMO Approval Certificate will have to be returned to EASA.
7 Limitation, Suspension and Revocation
Based upon a recommendation from the TL to Limit, Suspend or Revoke the EASA Part-CAMO Approval of an organisation, the EASA Head of Maintenance & Production Department in coordination with the FS.1.2 Section Manager and the EASA CAMOC will make a decision in relation to the Approval and formally notify the organisation about:

- The EASA decision related to the Revocation, Limitation or Suspension of the organisation’s EASA Part-CAMO Approval.
- The FO.CAMO.00015 “EASA Form 13-CAMO” Part 4, showing the confirmed Level 1 and the possible Level 2 finding(s).
- The need to take immediate action to the Level 1 finding(s).
- A time frame for the organisation to provide EASA with:
  - An acceptable Corrective Action Plan (CAP) for the Level 2 findings referenced in the FO.CAMO.00015 “EASA Form 13-CAMO” Part 4.
  - Evidence that additional measure(s) required by EASA have been taken by the organisation.

The organisation is expected to:

- Acknowledge receipt of the letter by return of mail, confirming that the organisation has put in place the restrictions required by EASA.
- Identify all continuing airworthiness management activities impacted by the Level 1 finding(s), take immediate corrective action to remove any safety threat and inform EASA accordingly.
- Provide the EASA with an acceptable corrective action plan (CAP) for the Level 2 findings referenced in the audit report within the defined time frame. This CAP can include the long term corrective action related to the Level 1 finding(s).
- Inform the relevant aircraft owner/operator and the related State of Registry/AOC Competent Authority – when necessary – about the Level 1 finding(s) and the results of the associated non-compliance investigation.

Where the organisation fails to comply with any of the above mentioned requirements, EASA could Revoke the EASA Part-CAMO Approval. In case of Revocation of an approval, the organisation will immediately send the original Approval Certificate back to EASA.

**Note:** During the Suspension/Limitation phase, the assigned Inspector remains the contact point for the organisation and all exchanges must be addressed to them. The EASA CAMOC will be copied into any communication related to the points addressed above.

The re-instatement of an EASA Part-CAMO Approval can be only envisaged once the assigned Inspector has received an acceptable corrective action to all findings.

The re-instatement audit will ensure all applicable requirements and CAME chapters are reviewed.
Where the re-instatement audit does not confirm acceptable implementation of the corrective actions, identifies additional findings, the assigned Inspector could make a recommendation to EASA to Revoke the approval.
8 Changes not requiring prior approval
8.1 Regulatory Background

As described in Commission Regulation (EU) No 1321/2014, CAMO.B.310(h), to enable an organisation to make Changes without prior Competent Authority approval in accordance with CAMO.A.130(c), the Competent Authority will approve the organisation’s procedure determining the extent of those Changes and describing how they will be managed and reported.

a) CAMO.A.130(c) - Changes to an organisation

All Changes not requiring prior approval will be managed and notified to the Competent Authority as defined in the procedure referred to in point (b) of point CAMO.A.115 and approved by the Competent Authority in accordance with point (h) of point CAMO.B.310.

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

Applicants for an initial certificate will provide the Competent Authority with documentation demonstrating how they will comply with the requirements established in Regulation (EU) 1321/2014. This documentation will include, as provided for in CAMO.A.130, a procedure describing how Changes not requiring prior approval will be managed and notified to the Competent Authority.

8.2 Procedure content

In accordance with the above requirements, when submitting an application for a Part-CAMO Approval, the organisation will include in its management system documentation (CAME, SMS Manual) a procedure dealing with Changes that do not require prior approval. This procedure should include, as mentioned in point CAMO.A.300(a)(11)(iv), both the scope of those Changes and how they will be managed and notified. For the details and the content of this procedure please refer to the UG.CAMO.00004 “Part-CAMO Approvals - User Guide for CAME (CAMO-AOC)”.

The possibility to agree with the Competent Authority that certain Changes to the organisation can be implemented without prior approval depends on the compliance and safety performance of the organisation, and in particular, on its capability to apply Change Management principles.

8.3 Access to and notification of revised documents

In order to ensure that both the organisation and the assigned Inspector remain in compliance with the requirements of Part-CAMO, the following point will be ensured:

- The assigned Inspector must be notified about all Changes approved by the organisation under the no-prior approval privilege, so it can be ensured that these Changes comply with the approved CAME procedure and the organisation has adequate control over the approval of them.
- The assigned Inspector acknowledged receipt of the document approved via the no-prior approval procedure in writing.

8.4 Change assessment procedure

The assigned Inspector receives the Change request, notified by the organisation as defined in its procedure approved in accordance with CAMO.B.310(h) and review it for completeness and compliance with the approved CAME procedure.
9 General Timeframes
9.1 Timeframe for an Initial Part-CAMO Approval (for reference only)

- Payment acknowledgment
- Exposure study
- Implementation of corrective actions
- Closure of findings and issuance of Form 13
- Certificate Form 14

9.2 Timeframe for Continuation of Part-CAMO Approval (for reference only)

- Initial Certificate
- Intermediate audit
- Change
- Continuation due date

**Notes:**
1. The payment acknowledgment also requests the applicant to prepare the CAME and associated Form 4s.
2. The applicant is informed by EASA regarding the point and address to which the CAME and Form 4 must be sent.
3. CAME study - based upon a good initial issue - by Team Leader and possible corrections by the applicant.
4. The on-site audit may be extended for one additional month to group audits in the same geographical area to reduce costs.
5. Implementation of corrective actions and notification to the Team Leader by the applicant.
6. The Team Leader to close the findings and issue the Recommendation Form 13
7. Form 13 quality check and certificate issuance: 2 weeks NAA review F13 and forward to EASA - 2 weeks EASA to process F13 and issue F14

**General Notes:**
1. The period for initial investigation can be extended if requested, the 7 month period is a general.
2. It is the applicant's responsibility to provide satisfactory documentation to EASA/NAA in order to expedite the process.