



EASA CA AltMoC	Ref # ALT_CAMO/24/0001 Filled in by EASA_CA
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<b>1. Alternative means of compliance (AltMoC)</b>	
1.1 Subject	Oversight programme - Interval between two audits for a particular process
1.2 Regulatory reference	Commission Regulation (EU) No 1321/2014 – Annex Vc – Part-CAMO
1.3 Regulation paragraph(s)	CAMO.B.305(c)
1.4 Agency acceptable means of compliance (AMC) available	Yes <input checked="" type="checkbox"/> Ref.: AMC2 CAMO.B.305(c) point (b)
	No <input type="checkbox"/>
1.5 AltMoC based on an AltMoC from another CA	Yes <input type="checkbox"/> Name of the CA:
	No <input checked="" type="checkbox"/>
1.6 Summary description of the AltMoC	<p>Possibility to omit point (b) of AMC2 CAMO.B.305(c) when establishing oversight planning cycles. Point (b) states:</p> <p><i>"The interval between two audits for a particular process should not exceed the interval of the applicable oversight planning cycle"</i></p>
1.7 Reason for EASA CA AltMoC	<p>The justification to omit this point is that it goes against and weakens the concept of the establishment of an oversight programme based on a Risk Based Oversight approach as required in CAMO.B.305(b), which states:</p> <p><i>"The oversight programme shall be developed taking into account the specific nature of the organisation, the complexity of its activities, the results of past certification and/or oversight activities, and shall be based on the assessment of associated risks."</i></p> <p>Being forced to plan the oversight activities taking into account the temporal constraints of the current AMC2 CAMO.B.305(c) point (b), makes not possible to structure and plan the oversight activities based upon the performance of the organisations and their inherent risks.</p> <p>Furthermore the current AMC1 CAMO.B.305(c) point (c) states:</p> <p><i>"When the competent authority, having regard to the level of risk identified and the effectiveness of the organisation's management system, varies the frequency of an audit or inspection, it should ensure that all aspects of the organisation's activity are audited and inspected within the applicable oversight planning cycle."</i></p> <p>This AMC basically allows the competent authority to vary frequency of audits/inspections having regard to the level of risk identified and the effectiveness of the organisation's management system, and therefore contradicts the temporal constraints posed by point (b) of AMC2 CAMO.B.305(c).</p> <p>Lastly, as part of the rules simplification project it has been already planned to delete AMC2 CAMO.B.305(c) point (b); however the NPA is scheduled for Q3-</p>





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	2025 and the related ED Decision with revised AMC/GM should occur later on (probably 2026).
1.8 Demonstration of safety level equivalence and demonstration of compliance to IR	<p>The proposed Alternative Means of Compliance will be still compliant with the related CAMO.B.305(c) paragraph, which states:</p> <p><i>“For organisations certified by the competent authority, an oversight planning cycle not exceeding 24 months shall be applied.”</i></p> <p>because the duration of the oversight planning cycle is not affected by the proposed change.</p> <p>In addition, the proposed Alternative Means of Compliance provides an acceptable and equivalent level of safety with the existing AMCs because:</p> <ul style="list-style-type: none"> <li>a) It keeps the requirement that all processes have to be completely audited at periods that do not exceed the applicable oversight planning cycle.</li> <li>b) It allows the inspector to prioritize the processes to be audited based on the level of risk identified and on the effectiveness of the organisation’s management system, in particular its ability to effectively manage safety risks.</li> </ul>
1.9 Impact on operational documentation	None.
1.10 Summary of the AltMoC compliance statement	<p>The proposed Alternative Means of Compliance will be compliant with the related CAMO.B.305(c) because the duration of the oversight planning cycle is not affected by AltMoC change.</p> <p>Furthermore it removes an inconsistency with the concept of risk based oversight programme introduced in CAMO.B.305(b).</p>
1.11 List of the attachments, if relevant	<p>01 – AltMoC to AMC2 CAMO.B.305(c) – Confirmation of need – E-mail</p> <p>02 – AltMoC to AMC2 CAMO.B.305(c) – Safety Assessment</p> <p>03 – CMF Audit 2024-01 CAMO – Audit Report – Appendix</p>
<b>2. Date and signature by EASA Executive Director</b>	Electronically signed, check ARES reference for date.

