



**NOTICE OF PROPOSED AMENDMENT (NPA) 2013-01**

**DRAFT DECISION OF THE EXECUTIVE DIRECTOR OF THE EUROPEAN AVIATION SAFETY AGENCY**

**amending Decision No 2003/19/RM of the Executive Director of the European Aviation Safety Agency of 28 November 2003 on Acceptable Means of Compliance (AMC) and Guidance Material (GM) to Commission Regulation (EC) No 2042/2003 of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks**

**and**

**DRAFT OPINION OF THE EUROPEAN AVIATION SAFETY AGENCY**

**for a Commission Regulation amending Commission Regulation (EC) No 2042/2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks**

**NPA 2013-01 (B) 'Part-M'**

**Embodiment of Safety Management System (SMS) requirements into Commission Regulation (EC) No 2042/2003**

**RMT.0251 (MDM.055)**

**Embodiment of Safety Management System (SMS) requirements into Commission Regulation (EC) No 2042/2003**

**Part-M**

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## **Explanatory Note Part-M**

### **Scope of changes**

Amendments have been made both to Section A and Section B of Part-M to align with the Regulations on air crew and air operations (Subparts GEN of Parts ORA/ORO and ARA/ARO respectively, hereafter referred to as ARX/ORX). A significant number of IRs, AMC, and GM are affected by the changes in terminology related to the new management system requirements. NPA A provides a more general description and information on the origin of changes.

## **SECTION A**

### **Management system**

The ICAO SMS framework has been implemented by defining specific management system requirements and related AMC/GM.

In order to define a consistent set of management system requirements that would be compatible with a wide range of management system standards the current requirements related to 'quality system' and to 'organisational review' have been reviewed. As they stand, these provisions primarily focus on the monitoring of compliance, a proper reporting to management, and the need to take effective corrective actions. The first of these elements – the monitoring of compliance – will persist as one core element also of the new management system; however, to ensure clarity and prevent misunderstandings on the underlying reference the former term 'quality system' is not used any longer.

The alignment with management system requirements defined in ORA.GEN.200/ORO.GEN.200 aims to ensure that the same basic organisation requirements apply to all organisations approved within the scope of Commission Regulation (EC) No 2042/2003, Commission Regulation (EC) No 1178/2011 as amended by Commission Regulation (EC) No 290/2012 (Air Crew), as well as Commission Regulation (EC) No 965/2012 (Air Operations). The existing alleviation for smaller organisations to substitute the compliance monitoring function (referred to as 'quality system') by a simpler system of organisational reviews has been maintained.

The genuinely new element included with these common management system provisions is the requirement for organisations to implement processes for hazard identification, risk assessment and mitigation, as well as for ensuring effective actions are taken to address the risks. This core requirement for safety management is complemented by a series of AMC providing detailed means of compliance and related guidance material.

### **Subpart F organisations**

More specifically, when it comes to Subpart F maintenance organisations, the approach followed with regard to the type of management system to be implemented here is to consider them as 'non-complex' by default. This reflects the nature of activities of such organisations which may only be approved to perform maintenance for aircraft (or components) other than large aircraft (other than complex motor-powered aircraft in the future, cf. Opinion 06/2012 'Alignment of Commission Regulation (EC) No 2042/2003 with Regulation (EC) No /2008') and not used in commercial air transport. This would allow Subpart F organisations to make use of alleviated management system provisions, such as the use of simple checklists integrated into normal operations to perform safety risk management, or the designation of a person who fulfils the role of safety manager, instead of having a dedicated safety manager (this can be the accountable manager or a person with an operational role within the organisation). All provisions on compliance monitoring have been clarified, without creating any additional

requirements: organisations with more than 10 maintenance staff (full time equivalents) need to implement a compliance monitoring function following the principles of Part-145, whereas organisations with up to 10 maintenance staff may continue to replace the compliance monitoring function by a system of organisational reviews. Therefore, Appendix VIII to AMC M.A.616 remains unchanged in its substance.

### **Subpart G organisations**

For Subpart-G organisations (Continuing Airworthiness Management Organisations (CAMOs)), the principles set forth with Part-ORO (Annex III to Commission Regulation (EU) No 965/2012) have been transposed, while maintaining the alleviation introduced with amending Commission Regulation (EC) No 1056/2008 (organisations with no more than 5 full-time equivalents (FTEs) and the staff being actively involved in continuing airworthiness management tasks may replace the compliance monitoring function by an organisational review under certain conditions). For all CAMOs, the AMC to be followed for the safety management related processes will depend on the 'complexity' of the organisation.

New AMC1 M.A.712(b) provides criteria for assessing organisational complexity based on the number of staff actively engaged in continuing airworthiness management, and the nature of the continuing airworthiness management activity. Subpart G organisations qualify as complex when one of the following conditions is met:

- the number of staff actively engaged in continuing airworthiness management tasks exceeds 10 FTEs, regardless of the type of activity;
- the organisation is involved in the continuing airworthiness management of complex motor-powered aircraft (CMPA):
  - either under a direct contract with an operator of CMPA;
  - or as a direct contractor for another Subpart G organisation that is involved in the continuing airworthiness management of CMPA;
- the organisation is involved in the continuing airworthiness management of aircraft used in commercial air transport (CAT):
  - either under a direct contract with an operator of aircraft used in CAT;
  - or as a direct contractor for another Subpart G organisation that is involved in the continuing airworthiness management of aircraft used in CAT.

In this context, it is important to note that Article 1.3 of Commission Regulation (EC) No 2042/2003 will remain unchanged. Therefore, all provisions related to CAT are solely applicable to licensed air carriers as defined by Community law. This excludes operators of balloons and sailplanes. Point (c) of the AMC proposes that Subpart G organisations only involved in the continuing airworthiness management of balloons or sailplanes qualify as non-complex by default.

AMC1 M.A.712(b) paragraph (b) specifies that the management system of an organisation holding any other organisation approval within the remit of Regulation (EC) 216/2008 should reflect the nature and complexity of the whole entity. This also implies that a Part-M Subpart G organisation approved as part of an AOC qualifying as 'non-complex' operator as per AMC1 ORO.GEN.200(b) should be considered non-complex also under Part-M.

The below list provides an overview of provisions specifically designed for organisations that qualify as non-complex on the basis of the proposed AMC1 M.A.712(b):

- The organisation may use simple procedures and tools for its safety risk management process (e.g. checklists), and safety performance monitoring and measurement (no need to perform extensive safety studies, surveys, etc.)

- The accountable manager or a person with an operational role in the organisation may fulfil the role of safety manager.
- The organisation does not need to have a safety review board, which is a high level committee to consider matters of strategic safety in support of the accountable manager's safety accountability.
- The accountable manager may also be the compliance monitoring manager provided that he/she has demonstrated the required competence and that the independence of the internal audits is maintained.

Both for complex and non-complex organisations the possibility to have the same person act as safety manager and as compliance monitoring manager, although not recommended for the larger, complex organisations, has not been excluded. Should this be the case, it must be ensured that sufficient resources are made available for both functions (safety management/compliance monitoring). It must also be ensured that the safety function has the necessary 'proactive' attitude to managing safety, as well as authority to request safety action. Finally, in line with the general auditing principles, the independence of inspections and audits must be ensured.

Regardless of which AMC apply (complex/non-complex), the organisation must be able to demonstrate that it has implemented processes for hazard identification and safety risk management, and that it ensures that mitigation actions are effective (cf. M.A.712(a)(3)).

The different criteria proposed in relation to the management system in general, and to compliance monitoring as part of the management system are summarised in the table below:

<b>Organisation</b>	<b>Reference</b>	<b>Management system</b>	<b>Compliance monitoring</b>
Subpart F organisations with more than 10 maintenance staff (FTEs)	M.A.616 AMC to M.A.616	Non-complex	CM function (aligned with Part-145)
Subpart F organisations with up to 10 maintenance staff (FTEs)	M.A.616 AMC to M.A.616 AMC M.A.616(a)(6) point 5	Non-complex	Organisational review
Subpart G organisations approved as part of an AOC – CAT* operator qualifying as 'complex' operator in accordance with AMC1 ORO.GEN.200(b)	M.A.712(d) AMC1 M.A.712(b) point b AMC1 ORO.GEN.200(b)	Complex	CM function
Subpart G organisations approved as part of an AOC – CAT* operator qualifying as 'non-complex' operator in accordance with AMC1 ORO.GEN.200(b)	M.A.712(d) AMC1 M.A.712(b) point b AMC1 ORO.GEN.200(b)	Non-complex	CM function
Independent Subpart G organisation involved in continuing airworthiness management (CAM) of CMPA	AMC1 M.A.712(b)	Complex	CM function
Subpart G organisation involved in CAM of aircraft <b>not</b> used in CAT* other than CMPA, except balloons and sailplanes	- issuing ARC for a/c > 2730kg MTOM - more than 10 CAM staff (FTEs)	M.A.712(e) AMC1 M.A.712(b) point a	Complex CM function
	- issuing ARC for aircraft > 2730kg MTOM - up to 10 CAM staff (FTEs)	M.A.712(e) AMC1 M.A.712(b) point a	Non-complex CM function
	- <u>not</u> issuing ARC for aircraft > 2730kg MTOM - more than 10 CAM staff (FTEs)	M.A.712(e) AMC1 M.A.712(b) point a	Complex CM function
	- <u>not</u> issuing ARC for aircraft > 2730kg MTOM	M.A.712(e) AMC1 M.A.712(b) point	Non-complex CM function

	- up to 10 CAM staff (FTEs)	a AMC1 M.A.712(e)		Up to 5 CAM staff (FTEs): Organisational review
Subpart G organisation involved in CAM of balloons or sailplanes only		AMC1 M.A.712(b) point c AMC1 M.A.712(e)	Non-complex	6-10 CAM staff (FTEs): CM function
				Up to 5 CAM staff (FTEs): Organisational review

\* CAT in the sense of Article 1.3 of the Commission Regulation (EC) 2042/2003



## **Changes to the Continuing Airworthiness Management Exposition - Management system documentation**

The Continuing Airworthiness Management Exposition (CAME) contents have been amended to reflect the introduction of new provisions related to the approval of alternative means of compliance and new safety management related processes.

This mainly leads to amending the titles of Part 2 and 5 and creating additional CAME chapters , as below:

### **PART O**

- 0.7 Alternative means of compliance procedure

### **PART 2 – now referred to as ‘MANAGEMENT SYSTEM PROCEDURES’**

- 2.7 Hazard identification and safety risk management schemes;
- 2.8 Safety action planning;
- 2.9 Safety performance monitoring;
- 2.10 Incident investigation and safety reporting;
- 2.11 Emergency response planning;
- 2.12 Management of change (including organisational changes with regard to safety responsibilities);
- 2.13 Safety promotion; and
- 2.14 Management system record keeping.

### **PART 5 – now referred to as ‘SUPPORTING DOCUMENTS’**

The generic term ‘management system documentation’ is used to refer to all documents the organisation needs to maintain in order to be able to demonstrate compliance with Part-M. This normally consists of a CAME and the related procedures. Considering the additional CAME items in Part 2, the organisation may also choose to document how it implements these new management system processes in a separate manual (e.g. Safety Management Manual – SMM, Management System Manual, etc.).

For organisations certified in accordance with any other EASA Part, this may prevent having to duplicate these elements. Moreover, it is generally possible to document specific elements in a separate procedure, to be referenced in the CAME or SMM or management system manual, etc. A new GM (GM1 M.A.712(a)(5)) is provided to explain different options.

## **Industry standards**

Specific provisions at AMC level have been introduced in order to consider and give credit for the implementation of management systems in accordance with Industry standards (such as ISO 9001:2008<sup>1</sup> or EN 9110:2009<sup>2</sup> or later revisions) by maintenance organisations.

These provisions address:

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<sup>1</sup> Published by the International Organization for Standardization - Case postale 56 • CH-1211 Geneva 20  
<sup>2</sup> published by the Aerospace and Defence Industries Association of Europe – Standardization - Avenue de Tervuren, 270 - B-1150 Brussels.

- the compliance monitoring function/organisational review in Subpart F organisations;
- maintenance work carried out by another organisation not appropriately approved under Subpart F or Part-145; and
- the contract review for contracted maintenance in relation to M.A.708 'Continuing airworthiness management'.

Consequently, new AMC material has also been added for the competent authorities, (Section B, both for Subpart F and Subpart G organisations), specifying the conditions when considering such certification schemes for the definition of the oversight programme. These AMC are fully aligned with those of Part-ARA/ORR.

### **Internal safety reporting scheme**

Considering the importance of effective internal reporting to build up a management system for safety, it is proposed to add new provisions for the implementation of an internal safety reporting scheme, taking the form of a new provision within Subpart G and of AMC to Subpart F. These shall provide means both for reactive and proactive hazard identification as part of safety management.

### **Human Factors**

The European Human Factors Advisory Group (EHFAG) has evaluated the Part-M requirements against good human factors principles that have been developed within the Part-145 requirements and implemented in Part-145 maintenance organisations in the past decades. The EHFAG has concluded that Part-M requirements lack a good basis of human factors requirements. Problems in human performance within the Part-M Subpart G Organisation and its interactions with contracted maintenance organisations have frequently been identified as contributing factors in accidents and serious incidents.

The material addressing EHFAG recommendations embodied in this NPA, as related to human factors, should form an integral part of a management system for safety, specifically in the following areas:

- a. Internal occurrence reporting.

Currently, Part-M lacks clear and specific rules on this subject. As internal safety reporting and error management form an important part of safety management, new provisions, aligned with the equivalent of Part-145, have been introduced.

- b. Personnel requirements

A lack of human factors competence can result in errors being made by staff within the Part-M Subpart G organisation and in poor decision making. HF competence, the understanding of human error and the consequences of human and organisational behaviour, is acknowledged as the basis for prevention of making errors. Therefore, to align with Part-145, human factors training requirements are established, both for initial and continuation training, in order to understand the application of human factors and human performance issues and to harmonise human factors competence standards between the CAMO and maintenance organisations. This improved rule is proposed to only apply to organisations managing complex motor-powered aircraft or aircraft used for commercial air transport. Guidance on the HF training to be delivered and the qualification and competence of HF trainers is also provided.

c. Continuing Airworthiness management:

Continuing airworthiness management should also take into account human factors and human performance limitations for ensuring good continuing airworthiness management practices. This should include the development of maintenance programmes and how they are delivered and used by the maintenance organisation.

The new material is focussed on raising awareness, increasing human reliability, hence reducing potential for error. This considers the key role that Part-M Subpart G organisations play in the management of safety critical airworthiness factors and in shaping the maintenance control structure within which the maintenance organisation intervenes.

### **Single type of approval for maintenance organisations**

As part of the alignment with the general organisation requirements developed for air crew and air operations (which, initially, had been designed to apply to all organisations under the EASA remit, the Agency evaluated the option to create a single approval for maintenance organisations, by merging Part-M Subpart F and Part-145. This could have resulted in filtering out a set of general requirements applicable to all maintenance organisations, including common management system provisions, complemented with additional requirements to be fulfilled by those maintenance organisations performing maintenance for large aircraft (CMPA in the future, cf. Opinion 06/2012 - RMT MDM.047) or aircraft used in commercial air transport.

Earlier this year, however, the EASA Management Board appointed a group to draft a proposal for a new European General Aviation Safety Strategy which led to a series of recommendations addressed to the Agency, Industry stakeholders, Member States and to the EU Commission calling for a different approach when regulating General Aviation. This Strategy group, among other items, recommended that, when drafting rules, a clear distinction be made between organisations involved with commercial air transport and other organisations, to ensure General Aviation will be considered 'as a sector in its own right and not as a watered-down Commercial Air Transport by-product.' Other recommendations aim at taking a 'blank sheet' approach in order to reconsider all existing regulations applicable to General Aviation. In this context, the group further recommended reassessing the need to hold separate approvals for maintenance, continuing airworthiness management, design, and production in the area of General Aviation.

In parallel with the European General Aviation Safety Strategy Group appointed to the Management Board, the Part-M General Aviation Task Force, created following a dedicated workshop that took place in October 2011, is engaged in a review of existing Part-M requirements. This work, since then, progressed in two phases. The first phase already resulted in the publication of NPA 2012-17, proposing a first set of alleviations mainly focussing on maintenance programme approval and airworthiness review. In the second phase the Part-M General Aviation Task Force, in coordination with the European General Aviation Safety Strategy Group is still to make additional recommendations for further action in the area of Part-M. This may, at a later stage, lead to issuing a second NPA to further amend Part-M.

Against the background of all these developments in the area of General Aviation, the Agency finally decided not to propose a unique maintenance organisation approval system at this stage.

### **Indirect approval vs changes not requiring prior approval**

The provisions on change to an existing certificate and changes to the CAME have been reviewed to align with Part-ORX. As a result, all references to 'indirect approval' have

been reworded. These changes are now designated as 'changes not requiring prior approval'. Linked to this, specific provisions are included for organisations wishing to implement changes without prior competent authority approval. The organisation shall have a procedure specifying the scope of such changes, describe how these will be managed, and submit this procedure to the competent authority for approval. The amended provisions fully meet the intent of 'indirect approval' or changes 'acceptable to the authority' as in current Part-M. These changes mainly affect current provisions in M.A.617 and M.A.713 'Changes to the organisation', as well as the corresponding Section B provisions in M.B.607 and M.B.706 'Changes'.

## **SECTION B**

Section B material has been reviewed to align with and introduce all additional elements from Subpart GEN of Part-ARA/Part-ARO (Authority Requirements developed for air crew and air operations). The most significant change is the introduction of specific provisions for the competent authority's management system on the basis of ARX.GEN.200 . Also, the provisions on initial approval and on change to an existing approval have been reviewed to align with ARX.GEN.310 and ARX.GEN.330. As a result, all references to 'indirect approval' have been reworded. These changes are now referred to as 'changes not requiring prior approval'. Moreover, provisions on the implementation of changes without prior competent authority approval have been inserted: In order to introduce such changes, the organisation shall develop a procedure specifying their scope, describe how these changes will be managed, and submit this procedure to the competent authority for approval. The amended provisions fully meet the intent of 'indirect approval' or changes 'acceptable to the authority' as in current Part-M. They allow the competent authority to control the scope of changes not requiring prior approval taking a performance based approach, by considering the results of past oversight and the maturity of the organisation's management system.

A new provision has been added to M.B.707 to address the specific case of third-country approvals (foreign EASA Part-M Subpart G organisations and additional locations of EASA Part-M Subpart G organisations having their principal place of business in a Member State) with regards to security alerts that may exist for some States. This will allow the competent authority to suspend an approval if the security situation in that State where the facility is located is not compatible with the conduct of an on-site audit. A new AMC is provided to specify criteria for the assessment of the security situation. These criteria have been defined with the assistance of the European Commission's Directorate-General Human Resources and Security. The new provisions are closely linked to ICAO Critical elements CE-7 'Surveillance Obligations' and CE-8 'Resolution of Safety Concerns', hence they complement the State's/Agency's safety oversight system to support SSP/EASP implementation.

### **Other changes to Sections A and B**

Specific provisions are now included in Section A and B of Part-M Subpart B 'Accountability' to allow persons responsible in accordance with M.A.201 or independent certifying staff in accordance with M.A.801(b)(2) to apply for the approval of an alternative means of compliance. This follows a recommendation made by the OPS.001 & FCL.001 review group in order to assess the need for such provision which had not been retained for OPS and FCL. Alternative means of compliance approved for a person may only be used by another person if processed again in accordance with the applicable requirements on prior approval (cf. new M.A.203 and M.B.104).

### **Editorial and consistency changes**

The term 'approval' has been replaced by 'certificate' when reference is made to the organisation's approval certificate as opposed to the process of approving it.

'Quality System' has been replaced by 'compliance monitoring function' throughout the text.

'Quality Manager' has been replaced by 'compliance monitoring manager'.

'Organisational review' has been replaced by 'compliance monitoring function' or 'management system' depending on the context.

'Surveyor' (competent authority) has been replaced by 'inspector' throughout Section B.

'Sub-contract' and its derivatives (sub-contractor, sub-contracted, etc.) have been replaced by 'subcontract', 'subcontractor', etc. throughout the text.

References to Commission Regulation (EC) No 1702/2003 have been updated to Commission Regulation (EU) No 748/2012.

References to 'this Annex' or 'this Part' have been reviewed for consistency and replaced by 'this Regulation' where necessary (by referring to 'this Part' all Cover Regulation provisions are excluded).

The numbering and format of those AMC and GM that have been amended in the course of this rulemaking task has been aligned with the current EASA Rulemaking style guide, which results in:

- adding an AMC/GM number to those amended AMC/GM (e.g. : AMC<sup>1</sup> M.A.616 instead of AMC M.A.616), including when there is only one AMC/GM;
- adding a subtitle to all new AMC and GM; and
- aligning numbered lists in the AMC/GM with the number format of the Implementing Rule ((a),(b)(c) instead of 1., 2., 3.).

This results in the coexistence of two different standards for the numbering of AMC/GM paragraphs and subparagraphs. For the final Agency Decisions to be issued following adoption of the relevant amendments at Implementing Rule level, a consolidated version of all AMC and GM to which uniform numbering styles will have been applied will be published.

### **Detailed list of changes**

NOTE:

- Items identified with a (\*) are aligned with the equivalent Part-145 items.

Reference	Type of change	Description
M.A.202 External occurrence reporting*	Title and text amended	In the title a reference to 'external' has been added to differentiate this rule from the new provisions on internal safety reporting included with Subpart G and Subpart F. In point (b), the term 'Agency' has been replaced by 'competent authority', for consistency.  Point (d) has been aligned with ORX.GEN.160.  Point (e) has been added to require a follow-up report for each reported occurrence, as defined in ORX.GEN.160.
AMC1 M.A.202 External occurrence reporting	new	This new AMC has been added to provide details of what the occurrence report should contain.
M.A.203 Means of compliance	new	This new provision has been added to include provisions for persons to apply for the approval of alternative means of compliance.
AMC1 M.A.203 Means of compliance	new	This new AMC complements the new provision and provides means to demonstrate that the alternative means of compliance ensures an equivalent level of safety.
AMC1 M.A.301-1 Continuing Airworthiness Tasks	amended	Editorial changes have been made to point 3.
M.A.302 Maintenance programme	amended	Point (c) has been amended to delete references to 'indirect approval'. This does not change the concept of allowing a CAMO to approve the maintenance programme, but improves legal certainty, as compared with a reference to 'indirect approval'.
GM1 M.A.401(d) Maintenance data	new	This new GM has been added for consistency with GM1 M.A.708(d); it introduces a reference to the ASD guide on simplified English.
M.A.601 Scope	amended	Editorial changes have been made.

Reference	Type of change	Description
AMC M.A.601 Scope	deleted	This AMC has been deleted as it is not in line with Article 4 of Regulation (EC) No 216/2008.
M.A.602 Application for an organisation certificate	title changed, amended	The title and text of this provision have been aligned with ORX.GEN.115 'application for an organisation certificate'.
AMC1 M.A.602 Application for an organisation certificate	renumbered, title changed, amended	The title and text of this AMC have been aligned with changes made to M.A.602.
Appendix IX to AMC1 M.A.602 and AMC1 M.A.702 EASA Form 2	amended	In the block 'limitation' of the A4 rating, a reference to 'group' has been added for consistency with A1, A2, and A3 ratings.
M.A.603 Terms of approval	title and text changed	The title has been changed to align with Part-ORX. The first sentence of point (a) has been deleted, as it states the obvious.
AMC1 M.A.603(a) Terms of approval	title changed and ATA table amended	This AMC has been aligned with changes made to M.A.603, and in rating C5 ATA chapter 85 has been added to ensure consistency with changes made in Part-145.
AMC1 M.A.603(c) Terms of approval	title changed, text amended	This AMC has been aligned with changes made to M.A.603. The first sentence in point (1) has been deleted, as it duplicates M.A.603(c)
M.A.604 Maintenance organisation manual	amended	Management system and safety policy have been added to the information to be included in the MOM. The provisions on indirect approval have been reviewed to align with the amended authority requirements in Section B on changes requiring or not requiring prior approval, this is based on ARX and ORX.
AMC1 M.A.604 Maintenance organisation manual	amended	In point (2) editorial changes have been made for consistency with changes made to M.A.616.

Reference	Type of change	Description
M.A.606 Personnel requirements	amended	<p>In point (d) 'subcontracted' has been replaced by 'contracted' for consistency with AMC1 145.A.30(d) (staff is either employed or contracted).</p> <p>Point (g) has been amended to refer to M.A.607 instead of Part-66.</p> <p>Point (h) has been removed, it is now included with M.A.607, in order to group all provisions relevant for certifying staff.</p>
AMC1 M.A.606(b) Personnel requirements	amended	Editorial changes have been made.
AMC1 M.A.606(c) Personnel requirements	amended	An editorial change has been made.
AMC1 M.A.606(d) Personnel requirements	amended	Points (1) and (3) have been amended for clarity.
AMC1 M.A.606(f) Personnel requirements	amended	An editorial change has been made.
AMC1 M.A.606(h)(2) Personnel requirements	deleted	Following the changes made in M.A.606, this AMC is now included as AMC1 M.A.607(b)(2).
M.A.607 Certifying staff	amended	Point (h) of M.A.606 has been included and the text further amended for consistency.
AMC M.A.607 Certifying staff	deleted	<p>The AMC text is split into:</p> <ul style="list-style-type: none"> <li>- GM1 M.A.607(b)(2) former point (1); and</li> <li>- AMC1 M.A.607(b)(1) former points (2) and (3).</li> </ul>
AMC1 M.A.607(b)(1) Certifying staff	new	This new AMC is taken from AMC M.A.607 points (2) and (3).



Reference	Type of change	Description
GM1 M.A.607(b)(2) Certifying staff	new	This new GM is taken from AMC M.A.607 point (1).
AMC1 M.A.607(d)(2) Personnel requirements *	re-identified M.A.607, amended	Former AMC M.A.606(h)(2) is now included as AMC1 M.A.607(d)(2). The reference to 'national equivalent acceptable to the competent authority' has been deleted, as such national equivalents no longer exist since the entry into force of EASA Part-FCL.  Furthermore, some editorial changes have been made.
AMC1 M.A.607(e) Personnel requirements *	renumbered	In line with changes made to M.A.607, AMC M.A.607(c) is now included as AMC1 M.A.607(e).
AMC1 M.A.610 Maintenance work orders	amended	Editorial changes have been made.
AMC1 M.A.613(a) Component certificate of release to service	amended	In point 2.6.2 related to serviceable components removed from a non-Member State registered aircraft the provisions on how to establish the airworthiness status of the component have been clarified. The same change has been made in Part-145 (cf. AMC2 145.A.50(d)).  Point 2.8 (e) has been amended to reflect the latest status in the area of bilateral agreements.
AMC1 M.A.615(b) Privileges of the organisation	amended	This AMC has been reviewed to clarify possible certification in accordance with industry standards for subcontractors, as related to technical standards and management system standards.
M.A.616 Management System*	significantly amended	This provision has been significantly amended to align with the elements of ORX.GEN.200 'management system'. This will ensure consistency of organisation approvals for those organisations approved in accordance with more than one Part.  Paragraph (d) has been added to maintain the possibility for organisations with no more than 10 maintenance staff to replace the compliance monitoring function by a simpler 'organisational review'.

Reference	Type of change	Description
AMC1 M.A.616(a) Management System*	new	This new AMC transposes AMC1 ORX.GEN.200(a) (1/2/3/5). This includes specific means to comply for non-complex organisations. Among other items, it calls for the implementation of an internal safety reporting scheme as this constitutes an essential element of the organisation's safety risk management processes.
GM1 M.A.616(a)(1) Management system*	new	This GM transposes Part-ORX GM related to the 'safety manager'.
GM1 M.A.616(a)(2) Management system*	new	This GM transposes Part-ORX GM related to the 'safety policy'.
AMC1 M.A.616(a)(3) Management system	new	This AMC for an internal safety reporting scheme has been added to complement the safety risk management related provisions under M.A.616(a)(3). Unlike in Part-145, it is included at AMC level.
GM1 M.A.616(a)(3) Management system	new	This new GM has been added to provide definitions related to internal safety reporting, safety culture and just culture.
AMC1 M.A.616(a)(4) *	new	This AMC transposes Part-ORX AMC related to 'training and communication on safety'.
GM1 M.A.616(a)(4) Management system*	new	This GM transposes Part-ORX GM related to the 'safety training programme'.
GM1 M.A.616(a)(5) Management system*	new	This GM transposes Part-ORX GM related to the management system documentation. Flexibility is provided for the organisation to determine the best solution for documenting its management system, and procedures so as to demonstrate that it complies with the applicable requirements. Organisations approved in accordance with more than one part do not need to duplicate information in several manuals.
AMC1 M.A.616(a)(6) Management system	title and text changed	This AMC, previously included as 'Organisational review', has been amended to align with the AMC to ORX.GEN.200(a)(6). It has also been aligned with the corresponding Part-145 provisions on the internal compliance monitoring function, in particular to specify the audit planning cycle'

Reference	Type of change	Description
		and conditions for increasing it.
AMC1 M.A.616(d) Management system	renumbered, amended	Former AMC M.A.616 'Organisational review' has been reviewed for consistency with the new M.A.616.
AMC2 M.A.616(d) Management system	new	This new AMC has been added to provide an alternative to the organisational review for organisations certified in accordance with EN 9110.
Appendix VIII to AMC1 M.A.616(d) Management system	title and text amended	Appendix VIII to AMC M.A.616 has been reviewed to align with changes made to M.A.616. This mainly concerns editorial changes, the general principles of the organisational review remain unchanged. A new item (12) to address the new safety management processes has been added.
M.A.617 Changes to the organisation*	title and text changed	The title has been aligned and the text reviewed to align with ORX.GEN.130. This now introduces the concept of changes not requiring prior approval in replacement of the 'indirect approval procedures'. The scope of such changes not requiring prior approval and procedures to manage them are to be defined in a dedicated procedure which is subject to competent authority approval. For changes other than those requiring prior approval by default, this allows more flexibility for the organisation and the authority to <i>individually</i> determine the 'privileges' of the organisation for controlling specific changes under its management system.
AMC1 M.A.617 Changes to the organisation*	new	This new AMC which has been added to align with AMC to ORX.GEN.130 addresses application time frames.
GM1 M.A.617(a) Changes to the organisation*	new	This new GM which has been added to align with GM to ORX.GEN.130 provides typical examples of changes that would require prior approval.
GM2 M.A.617(a) Changes to the organisations	new	This new GM which has been added to align with GM to ORX.GEN.130 addresses the change of name of an organisation without a change in legal entity.
M.A.618 Continued validity	title and text changed	The title has been aligned with changes made in Part-145, and the text reviewed to align with Part-ORX. The reference to 'approval' has been deleted from the title and text as it leaves it

Reference	Type of change	Description
		unclear whether this refers to the organisation's approval certificate or any specific approval granted to the organisation (such as for a new type of aircraft or a new location).
M.A.619 Findings*	amended	Changes have been made to align with Part-ORX. The definition of finding levels has been moved to Section B (cf. M.B.605) as the assessment of findings is made by the authority.
AMC1 M.A.619*	new	This AMC transposes Part-ORX AMC related to the need to address the effects of a non-compliance, as well as its root cause.
GM1 M.A.619*	new	This GM transposes Part-ORX GM and it provides for definitions of relevant the terms. These definitions are based on the ISO 9000:2005 definitions.
M.A.620 Means of compliance*	new	This new provision has been added to align with ORX.GEN.120. It applies to the Subpart F organisation, whereas M.A.203 applies to persons only.
AMC1 M.A.620 Means of compliance*	new	This AMC transposes AMC to ORX.GEN.120 and it defines means to demonstrate an equivalent level of safety.
M.A.621 Management system record keeping*	new	This new provision is added to include management system record keeping requirements
AMC1 M.A.621 Management system record keeping*	new	A new AMC has been added to align with Part-ORX (cf. AMC1 ORX.GEN.150(b)).
GM1 M.A.621 Management system record keeping*	new	A new GM has been added to align with Part-ORX (cf. GM1 ORX.GEN.150).
M.A.622 Immediate reaction to a safety problem	new	A new provision has been added to align with the applicable provisions of Part-ORX (cf. ORX.GEN.155).

Reference	Type of change	Description
M.A.702 Application for an organisation certificate	amended	This provision has been amended by introducing elements from M.B.701 that constitute requirements for the organisation, not for the authority. Point (c) of M.B.701 has not been maintained, as it is an operator requirement.
AMC1 M.A.702 Application for an organisation certificate	title changed and text amended	This AMC has been aligned with changes made to M.A.702.
AMC2 M.A.702 Application for an organisation certificate	new	This new AMC is based on points (a) to (c) of AMC M.B.701(a) which has been moved from section B to section A. Point (d) has not been maintained, as it is addressed to the operator and not to the CAMO.
M.A.703 Terms of approval	title changed	'Extent of approval' has been changed to 'Terms of approval' to align with ORX.GEN.125.
M.A.704 Continuing airworthiness management exposition	amended	The text of this provision has been amended to align with changes made to M.A.712. References to safety policy and safety management processes are now included. Point (c) has been reviewed to align with changes made in relation to 'indirect approval' (see M.A.713 and M.B.706).
AMC1 M.A.704 Continuing airworthiness management exposition	amended	The AMC has been reviewed to align with changes made in M.A.704. Some further editorial changes have been made throughout.  In point 10 (now included as (j)), the statement 'Failure to carry out this action invalidates the M.A. Subpart G continuing airworthiness management approval or the air operators certificate' has been deleted, as the intent is now covered through the provisions on changes requiring prior approval (see also GM1 M.A.713(a)).
M.A.706 Personnel requirements	amended	Point (j) has been deleted as the issue is already covered in M.A.704(a)(4). Point (k), now included as (j), has been amended to introduce additional competence criteria related to human factors.
AMC1 M.A.706 Personnel	deleted	The text of this AMC is now included with AMC1 M.A.706(f) and AMC1 M.A.706(g) to distinguish between those items related to sufficient number of staff (now AMC1 M.A.706(f)) and those

Reference	Type of change	Description
requirements		related to knowledge and experience (now AMC1 M.A.706(g)).
AMC1 M.A.706(f) Personnel requirements	new	This new AMC contains those elements of former AMC1 M.A.706 related to 'sufficient number of staff'.
AMC1 M.A.706(g) Personnel requirements	new	This new AMC contains those elements of former AMC1 M.A.706 related to 'knowledge and experience'. Knowledge of safety management systems has been added.
AMC1 M.A.706(j) Personnel requirements	renumbered, amended	AMC M.A.706(k) is now included as AMC1 M.A.706(j) following changes made in M.A.706. It has been complemented with additional training provisions related to the understanding, and application of human factors issues. These are based on a rulemaking proposal made by the EHFAG.
GM1 M.A.706(c) Personnel requirements	new	This new GM has been added to clarify that the person or group of persons referred to in M.A.706(c) also includes the compliance monitoring manager. The GM further clarifies that the compliance monitoring function itself needs to be monitored for compliance .
GM1 M.A.706(j) Personnel requirements*	new	This new GM to M.A.706(j) provides further guidance for the amended AMC M.A.706(k).
GM2 M.A.706(j) Personnel requirements*	new	This new GM provides clarification on trainer competence in the area of human factors. It is based on a rulemaking proposal made by the EHFAG.
M.A.708 Continuing Airworthiness Management	amended	A new point (d) is added to ensure continuing airworthiness management tasks take into account HF and human performance limitations. This is based on a rulemaking proposal made by the EHFAG and also addresses specific safety recommendations made to the Agency following serious incidents.
AMC1 M.708(c) Continuing Airworthiness Management	amended	This now emphasises compliance monitoring, and safety risk management in the context of contracting. Further editorial changes have been made.

Reference	Type of change	Description
AMC1 M.A.708(d) Continuing Airworthiness Management	new	This new AMC provides means of compliance for the new requirement included with M.A.708 related to considering human factors and human performance limitations in the context of continuing airworthiness management.
GM1 M.A.708(d) Continuing Airworthiness Management*	new	This new GM provides a reference to ASD 'Simplified Technical English for Aerospace and Defence'.
Appendix IX to AMC1 M.A.708(c) Continuing airworthiness management	amended	Point (2)(5) is amended to consider: <ul style="list-style-type: none"> <li>- provisions for monitoring the Part-145 organisation in terms of compliance and safety risk management effectiveness</li> <li>- possible certification in accordance with industry standards of the Part-145 approved organisation.</li> </ul>
M.A.709 Documentation	amended	In point (b), the reference to M.A.711 has been clarified (now this refers to M.A.711 <b>(a)</b> ). If the organisation is not the CAMO that has established the maintenance programme, it can still perform the airworthiness review.
AMC M.A.709	deleted	In line with legal drafting principles this AMC is now included as guidance material.
GM1 M.A.709(a) Documentation	new	Former AMC M.A.709, now included as GM, has been split to distinguish items related to M.A.709(a) and those related to M.A.709(b).
GM1 M.A.709(b) Documentation	new	This GM includes the last 6 paragraphs of former AMC M.A.709.
GM1 M.A.711(b) Privileges of the organisation	AMC now as GM	Former AMC M.A.711(b) has been changed to GM, in line with legal drafting principles (it does not provide means of compliance, but guidance).

Reference	Type of change	Description
M.A.712 Management system*	amended	<p>This provision has been significantly amended to align with the elements of ORX.GEN.200 'management system'. New items (a) and (b) are fully aligned with the ORX.GEN.200. This will ensure consistency of organisation approvals for those organisations approved in accordance with more than one Part.</p> <p>Former points (d) to (f), now included as (c) to (e), have been reviewed accordingly.</p>
AMC1 M.A.712(a)(1);(2);(3);(5) ) Management system	new	This new AMC has been added to transpose AMC1.ORX.GEN.200(a) (1/2/3/5). It provides for simplified means to comply with the management system requirements for non-complex organisations.
AMC1 M.A.712(a)(1) Management system *	new	This new AMC has been added to transpose AMC1.ORX.GEN.200(a) (1). It provides means to comply with the management system requirements for complex organisations, addressing the need for a safety manager, and a safety review board.
GM1 M.A.712(a)(1) Management system*	new	This GM transposes Part-ORX GM related to the safety manager.
GM2 M.A.712(a)(1) Management system*	new	This GM transposes Part-ORX GM related to the safety action group, that may be established (applicability: complex organisations).
AMC1 M.A.712(a)(2) Management system*	new	This AMC transposes Part-ORX AMC related to the safety policy.
GM1 M.A.712(a)(2) Management system*	new	This GM transposes Part-ORX and provides guidance on the safety policy.
AMC1 M.A.712(a)(3) Management system*	new	<p>This new AMC incorporates AMC 1 ORX.GEN.200(a)(3), applicable to complex organisations.</p> <p>In point 1, item (c)(ii) has been added to address safety recommendation SR UNKG-2010-072 'consider adding specific Guidance Material addressing the overall organisation structure, interfaces, procedures, roles, responsibilities and qualifications/competency of key personnel across all subcontract levels within such arrangements'. Further guidance on how to address</p>



Reference	Type of change	Description
		hazards that may be generated from the existence of complex, multi-tier, subcontract maintenance and operational arrangements is included with new GM1 M.A.712 (a)(3) Management system.
AMC2 M.A.712(a)(3) Management system	new	This new AMC addresses safety risk management related to hazards that may be generated from the existence of complex subcontract maintenance and operational arrangements.
GM1 M.A.712(a)(3) Management system	new	This new GM provides general guidance on safety risk management.
GM2 M.A.712(a)(3) Management system	new	This new GM provides further guidance on reactive and proactive schemes for hazard identification, and provides a link with new M.A.721 on internal safety reporting.
GM3 M.A.712(a)(3) Management system *	new	This new GM provides further guidance on the management of change.
GM4 M.A.712(a)(3) Management system*	new	This new GM provides further guidance on the Emergency Response Planning.
AMC1 M.A.712(a)(4) *	new	This AMC transposes Part-ORX AMC related to training and communication on safety.
GM1 M.A.712(a)(4) Management system*	new	This GM transposes Part-ORX GM related to the safety training programme.
AMC1 M.A.712(a)(5) Management system	title and text amended	The existing AMC M.A.712(a) 'Quality System' has been reviewed to align with changes made in M.A.712: Points 1. and 2., now included as (a) and (b), are maintained, whereas points 3. to 5. are now included with AMC1 M.A.712(a)(6). The text of the paragraphs that have been moved has been reviewed for consistency with changes made to M.A.712.
GM1 M.A.712(a)(5)	new	This GM transposes Part-ORX GM related to the management system documentation. Flexibility is provided for the organisation to determine the best solution for documenting its management

Reference	Type of change	Description
Management system*		system, and procedures so as to demonstrate that it complies with the applicable requirements. Organisations approved in accordance with more than one part do not need to duplicate information in several manuals as long as they can demonstrate that all required items are documented.
AMC1 M.A.712(a)(6) Management system	title and text amended	The existing AMC M.A.712(b) 'Quality System' has been reviewed to align with changes made in M.A.712. Numbering of paragraphs has been changed from 1./2./3. to (a)/(b)/(c). Point 9. of the existing AMC has been included as point (e).  Points 3. to 5. of AMC. M.A.712(a) have been incorporated.  Further editorial changes have been made.
GM1 M.A.712(a)(6) Management system*	new	This new GM has been added to align with Part-ORX. It provides definitions for audit and inspection, which are based on ISO 9000:2005.
AMC1 M.A.712(b) Management system	new	This new AMC transposes AMC1 ORX.GEN.200(b). The criteria for determining organisational complexity have been adapted to the Part-M Subpart G context. Organisations that have no more than 10 staff actively involved in continuing airworthiness management AND that are not involved in the management of continuing airworthiness of complex motor-powered aircraft or aircraft used in CAT are considered non-complex for the purpose of the management system.
GM1 M.A.712(b) Management system	new	This GM provides guidance on the meaning of 'not involved in the continuing airworthiness management of...' used in AMC1 M.A.712(b).
AMC1 M.A.712(e) Management system	renumbered, amended	The existing AMC M.A.712(f) has been reviewed to align with changes made in M.A.712. Further editorial changes have been made. The possibility to replace the compliance monitoring function by an organisational review is provided for organisations that fulfil all of the following conditions: <ul style="list-style-type: none"> <li>- having no more than 5 FTEs (including M.A706 personnel);</li> <li>- not managing the continuing airworthiness of aircraft involved in CAT; and</li> <li>- not managing the continuing airworthiness of aircraft above 2 730 kg MTOM other than balloons.</li> </ul>

Reference	Type of change	Description
Appendix XIII to AMC M.A.712(e) Management system	renumbered, text changed	<p>Appendix XIII to AMC M.A.712(f) is now included as 'Appendix XIII to AMC M.A.712(e)'. It has been reviewed to align with changes made throughout Subpart G.</p> <p>The check item 'Is it justified to retain in the approved scope of work aircraft types for which the organisation has no longer aircraft under contract?' has been deleted. The risks of not performing any continuing airworthiness management activities for a particular type of aircraft for a longer period of time are to be assessed as part of safety risk management processes. A new point (12) 'Safety Management' has been added.</p>
M.A.713 Changes to the organisation*	title and text amended	This provision has been amended to align with ORX.GEN.130. This now introduces the concept of changes not requiring prior approval in replacement of the indirect approval procedures.
AMC1 M.A.713 Changes to the organisations*	new	This new AMC has been added to align with AMC to ORX.GEN.130, and addresses application time frames.
GM1 M.A.713(a) Changes to the organisations*	new	This new GM has been added to align with GM to ORX.GEN.130, and provides typical examples of changes that would require prior approval.
GM2 M.A.713(a) Changes to the organisations*	new	This new GM has been added to align with GM to ORX.GEN.130, and addresses the change of name of an organisation without a change in legal entity.
GM3 M.A.713 Changes to the organisations	title and text amended	The existing AMC M.A.713 has been reviewed and is now included as GM as it does not provide a means to comply. A reference to Part-ORO has been added.
M.A.714 Continuing airworthiness management record keeping	title amended	'Continuing airworthiness management' has been added in the title to differentiate this provision from the new provision on management system related record keeping (M.A.717).
M.A.715 Continued	title and text	The title has been changed to ensure consistency throughout Commission Regulation (EC)

Reference	Type of change	Description
validity	amended	No 2042/2003. The text has been reviewed to align with changes made throughout Part-M.
M.A.716 Findings*	amended	This provision has been amended to align with Part-ORX. The definition of finding levels is now included with Section B as the assessment is to be made by the authority.
AMC1 M.A.716 Findings*	new	A new AMC has been added to align with Part-ORX (cf. AMC1 ORX.GEN.150(b)).
GM1 M.A.716 Findings*	new	A new GM has been added to align with Part-ORX (cf. GM1 ORX.GEN.150).
GM2 M.A.716 Findings*	new	This new GM on root cause analysis has been added as requested, by the drafting group RMT M.027 'ACAM'. It was agreed this should be done as part of task MDM.055 as it is also directly relevant in the context of SMS.
M.A.717 Management system record keeping*	new	This new provision is added to include management system record keeping requirements
AMC1 M.A.717 Management system record keeping*	new	A new AMC has been added to align with Part-ORX (cf. AMC1 ORX.GEN.150(b)).
GM1 M.A.717 Management system record keeping*	new	A new GM has been added to align with Part-ORX (cf. GM1 ORX.GEN.150).
M.A.720 Means of compliance*	new	This new provision has been added to align with ORX.GEN.120.
AMC1 M.A.720 Means of compliance*	new	This new AMC has been added to align with ORX.GEN.120.
M.A.721 Internal safety	new	This new provision has been added to align with Part-ORX. Unlike in ORX, this has been included at IR level to strengthen the provisions that are essential for effective risk management. The text

Reference	Type of change	Description
reporting scheme*		considers additional input from the EHFAG.
AMC1 M.A.721 Internal safety reporting scheme*	new	This new AMC complements the new provision.
GM1 M.A.721 Internal safety reporting scheme	new	This new GM has been added to provide definitions related to internal safety reporting, safety culture, and just culture.
M.A.722 Immediate reaction to a safety problem*	new	This new provision has been added to align with ORX.GEN.155.
M.B.102 Competent authority	deleted	This provision has been deleted: Point (a) is now addressed in the new Cover Regulation article 'oversight capabilities'; points (b) to (d) are now addressed in the new provision M.B.110 'Management system'.
AMC M.B.102(a) Competent authority – General	deleted	This AMC has been deleted, its text is now included as AMC1 M.B.110 'Management system'. The text has been reviewed for consistency with the new M.B.110.
AMC M.B.102(c) Competent authority – Qualification and training	deleted	This AMC has been deleted, its text is now included as AMC2 M.B.110(a)(3) 'Management system'. The text has been reviewed for consistency with the new M.B.110.
AMC M.B.102(d) Competent authority organisation – procedures	deleted	This AMC has been deleted, and is superseded by the new AMC1 M.B.110(a)(1).
M.B.103 Oversight documentation*	new	A new provision has been added to align with ARX (cf. ARX.GEN.115). It complements the new CR Article 'Oversight capabilities'.

Reference	Type of change	Description
M.B.104 Means of compliance *	new	A new provision has been added to align with ARX.GEN.120. This forms the counterpart to the new provisions in M.A.203, M.A.620 and M.A.720.
AMC1 M.B.104(d)(3) Means of compliance*	new	A new AMC has been added to align with ARX.GEN.120 related AMC (cf. AMC1 ARX.GEN.120(d)(3)).
GM1 M.B.104 Means of compliance*	new	A new GM has been added to align with ARX.GEN.120 related GM (cf. GM1 ARX.GEN.120).
M.B.105 Information to the Agency *	new	A new provision has been added to align with ARX.GEN.125.
M.B.106 Immediate reaction to a safety problem*	new	A new provision has been added to align with ARX.GEN.135.
M.B.110 Management system*	new	A new provision has been added to align with ARX.GEN.200. Point (a)(2) of ARX.GEN.200 has been included as two distinct points (a)(2) and (a)(3) to differentiate between provisions related to the number of staff and those related to training and qualification. This allows to better focus the related AMC on those two aspects. .
AMC1 M.B.110 Management system*	title and text amended	AMC M.B.102(a) Competent authority is now included as AMC to new M.B.110. The text has been further amended (editorial changes only).
GM1 M.B.110 Management system*	new	A new GM has been added to align with GM1 ARX.GEN.200(a).
AMC1 M.B.110(a)(1) Management system*	new	This new AMC on documented policies and procedures has been added to transpose AMC1 ARX.GEN.200(a)(1).
GM1 M.B.110(a)(2)	new	This new GM has been added to transpose GM1 ARA.GEN.200(a)(2) on sufficient personnel.

Reference	Type of change	Description
Management system*		
AMC1 M.B.110(a)(3) Management system*	new	This new AMC on qualification and training general has been added to transpose AMC1 ARX.GEN.200(a)(2).
AMC2 M.B.110(a)(3) Management system*	amended	AMC M.B.102(c) is now included as AMC to M.B.110(a)(3). Editorial changes have been made for consistency.  In point 1.2, a reference to SMS has been added (comprehensive knowledge required).
AMC3 M.B.110(a)(3) Management system*	new	A new AMC has been added to transpose ARX (cf. AMC2 ARX.GEN.200(a)(2)) on initial and recurrent training.
AMC4 M.B.110(a)(3) Management system*	new	This new AMC on competence assessment has been added in response to recurrent standardisation findings.
AMC1 M.B.110(d) Management system*	new	This new AMC specifying the procedures to be made available to the Agency for the purpose of standardisation has been added to transpose ARX (cf. AMC1 ARX.GEN.200(d)).
M.B.111 Allocation of tasks to qualified entities*	new	This new provision has been added to align with ARX.GEN.205.
GM1 M.B.111 Allocation of tasks to qualified entities*	new	A new GM has been added to align with Part-ARX. It clarifies which tasks can be allocated to a qualified entity.
M.B.112 Changes in the management system*	new	A new provision has been added to align with ARX.GEN.210. This mirrors the change management provisions introduced in Section A.
M.B.114 Record keeping*	renumbered, text changed	M.B.104 'Record keeping' is now included as M.B.114. The text has been reviewed to align with ARX.GEN.220.

Reference	Type of change	Description
AMC1 M.B.114(a) Record keeping*	renumbered, text changed	AMC M.B.104(a) is now included as AMC M.B.114(a). The text has been reviewed to align with ARX.GEN.220 related to management system records.
AMC1 M.B.114(a)(1) Record keeping*	new	A new AMC has been added to transpose ARX (cf. AMC2 ARX.GEN.200(a)(1),(2),(3)).
GM1 M.B.114 Record keeping*	new	A new GM has been added to align with Part-ARX. It clarifies version control as applied to records.
AMC1 M.B.114(d) Record keeping*	renumbered, text changed	AMC M.B.104(f) is now included as AMC to M.B.114. Some editorial changes have been made to the text.
M.B.105 Mutual exchange of information	deleted	This provision has been deleted as the issue is now addressed in new M.B.100 (see point (c)).
AMC M.B.105(a) Mutual exchange of information	deleted	This AMC has been deleted, the issue is now addressed in a new provision, included in Subpart I.
M.B.130 Oversight principles *	new	A new provision has been added to align with ARX.GEN.300. The title has been changed by adding 'principles' in order to differentiate these general provisions from the more specific ones dealing with the 'continuation' of an approval.
AMC1 M.B.130(f) Oversight principles *	new	This AMC has been added to provide a non-exhaustive list of issues to be considered in terms of safety information deemed useful for oversight.
M.B.201 Responsibilities	amended	A reference to 'audit' has been added for consistency.
M.B.301 Maintenance Programme	amended	The provisions on approval by a Subpart G organisation have been reviewed to substitute the term 'indirect approval', in line with legal drafting principles.
M.B.302 Exemptions	deleted	This provision has been deleted, the issue being addressed in the provision on record keeping.



Reference	Type of change	Description
M.B.601 Application	deleted	This provision has been deleted, as the issue is now addressed in the new M.B.130 'Oversight principles' (cf. point (e)).
M.B.602 Initial certification procedure *	title and text amended	M.B.602 Initial Approval has been renamed and amended order to align with ARX.GEN.310.
AMC1 M.B.602(a) Initial certification procedure *	new	This new AMC on verification of compliance has been added to align with Part-ARX (cf. AMC1 ARX.GEN.310(a)).
AMC2 M.B.602(a) Initial certification procedure *	renumbered, title and text changed	AMC M.B.602(a) is now included as AMC 2, the text has been amended for consistency with changes made throughout Part-M.
AMC M.B.602(b) Initial approval	deleted	This AMC has been deleted as it is superseded by the new M.B.602.
AMC1 M.B.602(c) Initial certification procedure*	renumbered, title and text changed	AMC M.B.602(f) is now included as AMC1 M.B.602(c), and the text has been amended for consistency with changes made throughout Part-M.
AMC1 M.B.602(d) Initial certification procedure*	renumbered, title and text changed	AMC M.B.602(e) is now included as AMC1 M.B.602(d), and the text has been amended for consistency with changes made throughout Part-M.
AMC1 M.B.602(e)(2) Initial certification procedure*	Renumbered, amended	The text of AMC M.B.602(a), now included as AMC1 M.B.602(e)(2), has been reviewed to align with changes made in AMC 145.B.20(1) (now included as AMC1 145.B.32(b)(5)).
AMC M.B.602(g) Initial approval	deleted	This AMC is now included with AMC M.B.602(c); cf. new point (3).
AMC1 M.B.602(g) Initial	renumbered,	AMC M.B.603(a) is now included as AMC1 M.B.602(g). The first paragraph has been deleted as

Reference	Type of change	Description
certification procedure	title and text changed	the issue is addressed in Subpart A of Section B (cf. M.B.130 point (d)).
M.B.603 Issue of approval	deleted	This is now included in M.B.602 as amended.
AMC M.B.603(c) Issue of approval	deleted	This AMC is obsolete.
M.B.604 Oversight programme *	title and text changed	The title and text have been aligned with ARX.GEN.305.
AMC1 M.B.604(a);(b) Oversight programme*	new	This new AMC has been added to define an annual review of the audit programme and audit planning cycle.
AMC1 M.B.604(b) Oversight programme*	new	A new AMC has been added to align with AMC1 ARX.GEN.305(b) on the aspects to be considered when determining the oversight programme for an organisation.
AMC2 M.B.604 (b) Oversight programme*	new	A new AMC has been added to align with AMC1 ARX.GEN.305(b);(c) on industry standards.
AMC1 M.B.604 (b)(1) Oversight programme*	new	A new AMC has been added to align with AMC1 ARX.GEN.305(b)(1) .
AMC1 M.B.604 (c) Oversight programme*	new	A new AMC has been added to align with AMC1 ARX.GEN.305(c) related to determining the oversight planning cycle based on a risk assessment for the organisation under consideration.
AMC2 M.B.604 (c) Oversight programme*	new	A new AMC has been added to align with AMC2 ARX.GEN.305(c) related to the meaning of oversight planning cycle. This also specifies the conditions for granting credits for specific audit items. The starting point for this new AMC was the text existing in AMC 145.B.30(1). The text has been reviewed as stakeholder comments received indicated it was not clear.

Reference	Type of change	Description
AMC M.B.604 (b) Continuing oversight	deleted	The issues addressed are now covered in the new AMC on oversight programme (see in particular AMC3 M.B.604 (c)).
AMC3 M.B.604 (c) Oversight programme*	new	This addresses the elements of former AMC 145.B.30(2) 'Continuation of an approval'. Point 4 has been deleted as this point is now addressed at provision level. Point 5 has been deleted, it is now addressed in AMC1 145.B.33(b).
AMC1 M.B.604(d) Oversight programme*	new	This new AMC has been added to define an annual validation inspection to confirm the audit programme and audit planning cycle when it is extended beyond 24 months.
AMC2 M.B.604(d) Oversight programme*	new	This new AMC has been added for the competent authority to define the format and methods of safety reporting when the audit planning cycle is extended beyond 24 months.
GM1 M.B.604 Oversight programme*	new	This new GM explains the terms 'audit', 'inspection', oversight planning cycle' and oversight programme'.
GM1 M.B.604 (d) Oversight programme*	new	This new GM has been added for the competent authority to develop procedures for assessing the safety performance and management system maturity of an organisation.
M.B.605 Findings and corrective actions*	title changed, amended	Title changed has been changed to 'Findings and corrective actions' to align with Part-ARX, and the text has been reviewed to align with ARX.GEN.350. This ensures the same definitions for level 1 and level 2 findings are used for ATOs, Aero-medical Centres, Operators, Part-M Subpart F, Part-M Subpart G, and Part-145 organisations.
AMC1 M.B.605(d)(1) Findings and corrective actions*	title changed, renumbered	AMC M.B.605(a)1 is now included as AMC M.B.605(d)(1).
M.B.606 Changes*	amended	The text has been aligned with ARX.GEN.330.
AMC1 M.B.606 Changes	amended	The existing AMC to M.B.606 has been reviewed for consistency with the new M.B.606.

Reference	Type of change	Description
GM1 M.B.606 Changes*	new	This new GM on change of name of the organisation has been added to align with GM1 ARX.GEN.330
M.B.607 Suspension, limitation and revocation*	title changed	The title has been changed to align with changes made in Part-145. The text remains unchanged.
M.B.701 Application	deleted	This has been moved to Section A as it contains requirements for the organisation (cf. M.A.702 as amended).
AMC M.B.701(a) Application	deleted	This is now included in Section A, cf. AMC M.A.702(b).
M.B.702 Initial certification procedure	title changed, amended	M.B.702 'Initial approval' has been renamed and amended in order to align with ARX.GEN.310.
AMC M.B.702(a) Initial approval	deleted	The text of this AMC is now included as AMC1 M.B.702(e)(2).
AMC1 M.B.702(b) Initial certification approval	deleted	The text of this AMC is now included as AMC1 M.B.702(e)(3).
AMC1 M.B.702(c) Initial certification approval	deleted	The text of this AMC is now included as AMC2 M.B.702(b).
AMC1 M.B.702(e) Initial certification approval	deleted	The text of this AMC is now included as AMC1 M.B.702(c).
AMC1 M.B.702(f) Initial certification approval	deleted	The text of this AMC is now included as AMC2 M.B.702(c).
AMC1 M.B.702(g) Initial	deleted	The text of this AMC is now included as point (3) in AMC2 M.B.702(c).

Reference	Type of change	Description
certification approval		
AMC1 M.B.702(a) Initial certification procedure	new	This new AMC on verification of compliance has been added to align with Part-ARX (cf. AMC1 ARX.GEN.310(a)).
AMC2 M.B.702(a) Initial certification procedure	renumbered, title and text changed	AMC M.B.702(c) is now included as AMC2 M.B.702(b), and the text has been amended for consistency with changes made throughout Part-M.
AMC1 M.B.702(c) Initial certification procedure	renumbered, title and text changed	AMC M.B.702(e) is now included as AMC1 M.B.702(c), and the text has been amended for consistency with changes made throughout Part-M.
AMC2 M.B.702(c) Initial certification procedure	renumbered, title and text changed	AMC M.B.702(f) is now included as AMC2 M.B.702(c), and the text has been amended for consistency with changes made throughout Part-M.
AMC1 M.B.702(e) Initial approval	deleted	This AMC is now included as AMC1 M.B.702(c).
AMC1 M.B.702(e)(2) Initial certification procedure	renumbered, title and text changed	AMC M.B.702(a) is now included as AMC1 M.B.702(e)(2). Point 3 has been added for consistency with Part-145.
AMC1 M.B.702(e)(3) Initial certification procedure	renumbered, title changed	AMC M.B.702(b) is now included as AMC1 M.B.702(e)(3).
AMC M.B.702(g) Initial approval	deleted	This AMC has been deleted as it is superseded by AMC2 M.B.702(c), see point 3.
GM1 M.B.702(e)(1) Initial	renumbered, title and text	AMC M.B.703 is now included as GM1 to M.B.702(e)(1). As this provides examples, it is more

Reference	Type of change	Description
certification procedure	changed	appropriate to include it as GM.
M.B.703 Issue of approval	deleted	This provision is deleted, the issue being addressed in M.B.702, as amended (see point (f)). The reference to the AOC in point (d) is no longer required as this will be addressed in Part-ARO.
AMC M.B.703 Issue of approval	deleted	This is now included as GM1 to M.B.702(e)(1). (see above)
AMC M.B.703(a) Issue of approval	deleted	This AMC is deleted as the issue is now addressed in M.B.130 point (d).
AMC M.B.703(c) Issue of approval	deleted	This AMC is obsolete.
M.B.704 Oversight programme *	title and text changed	The title and text of existing M.B.704 'Continuing oversight' have been aligned with ARX.GEN.305.
AMC1 M.B.704(a);(b) Oversight programme*	new	This new AMC has been added to define an annual review of the audit programme and audit planning cycle.
AMC1 M.B.704(b) Oversight programme*	new	A new AMC has been added to align with AMC1 ARX.GEN.305(b) on the aspects to be considered when determining the oversight programme for an organisation.
AMC2 M.B.704(b) Oversight programme*	new	A new AMC has been added to align with AMC1 ARX.GEN.305(b);(c) on industry standards.
AMC1 M.B.704(b)(1) Oversight programme*	new	A new AMC has been added to align with AMC1 ARX.GEN.305(b)(1) .
AMC1 M.B.704(c) Oversight programme*	new	A new AMC has been added to align with AMC1 ARX.GEN.305(c) related to determining the oversight planning cycle based on a risk assessment for the organisation under consideration.

Reference	Type of change	Description
AMC2 M.B.704(c) Oversight programme*	new	A new AMC has been added to align with AMC2 ARX.GEN.305(c) related to the meaning of oversight planning cycle. This also specifies the conditions for granting credits for specific audit items. The starting point for this new AMC was the text existing in AMC 145.B.30(1) The text has been reviewed as stakeholder comments received indicated it was not clear.
AMC3 M.B.704(c) Oversight programme	renumbered, title and text changed	Items 1 to 4 and item 6 of the former AMC M.B.704(b) 'Continuing oversight' have been deleted as the issues are now included in the new AMC to M.B.704. Editorial changes have been made in the remaining text to improve clarity.
AMC1 M.B.704(d) Oversight programme*	new	This new AMC has been added to define an annual validation inspection to confirm the audit programme and audit planning cycle when it is extended beyond 24 months.
AMC2 M.B.704(d) Oversight programme*	new	This new AMC has been added for the competent authority to define the format and methods of safety reporting when the audit planning cycle is extended beyond 24 months.
GM1 M.B.704 Oversight programme*	new	This new GM explains the terms 'audit', 'inspection', oversight planning cycle' and oversight programme'.
GM1 M.B.704 (d) Oversight programme*	new	This new GM has been added for the competent authority to develop procedures for assessing the safety performance and management system maturity of an organisation.
M.B.705 Findings and corrective actions*	title changed, amended	The title has been changed to 'Findings and corrective actions' to align with Part-ARX, and the text has been reviewed to align with ARX.GEN.350. This ensures the same definitions for level 1 and level 2 findings are used for ATOs, Aero-medical Centres, Operators, Part-M Subpart F, Part-M Subpart G, and Part-145 organisations.
AMC1 M.B.705(d)(1) Findings and corrective actions*	title changed, renumbered	AMC M.B.705(a)1 is now included as AMC M.B.705(d)(1).
M.B.706 Changes *	amended	The text has been aligned with ARX.GEN.330.

Reference	Type of change	Description
AMC1 M.B.706 Changes*	amended	The text has been aligned with AMC to ARX.GEN.330.
GM1 M.B.706 Changes *	new	This new GM on change of name of the organisation has been added to align with GM1 ARX.GEN.330.
M.B.707 Suspension, limitation and revocation*	title changed	The title has been changed to align with changes made in Part-145. The text remains unchanged. A new point (c) has been added to address the case of maintenance organisations located in States where the security situation is not compatible with the conduct of any on-site audit.
AMC1 M.B.707(c) Suspension, limitation, and revocation	new	This new AMC complements the new M.B.707(c), and it introduces a link with the EU monitoring of security in third-countries.
M.B.904 Exchange of information	new	This new provision has been added to incorporate former AMC M.B.105(a) 'Mutual exchange of information' for consistency and clarity.
Appendix VI CAMO approval referred to in Annex I	editorial changes	Points 2.6 and 2.17 have been amended for consistency. References to 'quality system' have been replaced by 'management system'.
Appendix II to M.A.201(h)1: Subcontracting of CAM tasks	editorial changes	References to 'quality system' have been replaced by 'management system'. References to 'quality monitoring' have been replaced by 'compliance monitoring'.
Appendix V to AMC1 M.A.704 CAME	editorial changes	References to 'quality system' have been replaced by 'management system'. References to 'quality monitoring' have been replaced by 'compliance monitoring'. <ul style="list-style-type: none"> <li>- In Part 0, a new chapter for the procedures related to alternative means of compliance has been added.</li> <li>- In Part 2, additional chapters have been added to include the new safety management related</li> </ul>



Reference	Type of change	Description
		<p>processes.</p> <ul style="list-style-type: none"> <li>- Part 5 has been renamed 'Supporting documents' for consistency with changes made in Part-145.</li> </ul> <p>A number of editorial changes have been made.</p>
<p>Appendix VI to AMC1 M.B.602(c) EASA Form 6F</p>	<p>renumbered, title and text changed</p>	<p>Appendix VI to AMC M.B.602(f) has been re-identified as Appendix VI to AMC M.B.602(c). The approval recommendation report has been amended to reflect changes made in Subpart F.</p>
<p>Appendix VI to AMC 1M.B.702(c) EASA Form 13</p>	<p>renumbered, title and text changed</p>	<p>Appendix VI to AMC M.B.702(f) has been re-identified as Appendix VI to AMC M.B.702(c). The approval recommendation report has been amended to reflect changes made in Subpart F.</p>

**Draft Opinion /Decision ANNEX I (Part-M)**

The text of the amendment is arranged to show deleted text, new text or new paragraph as shown below:

1. Deleted text is shown with a strike through: ~~deleted~~.
2. New text is highlighted with grey shading: **new**.
3. [...] indicates that remaining text is unchanged in front of or following the reflected amendment.
4. When only certain elements of the rule, AMC, or GM are amended, this is specified (e.g. *'Point 3 of the AMC is amended as below.'*). If no indication is provided, the integral text of the rule, AMC, or GM is included.
5. In order to facilitate processing and consultation, all new and amended AMC and GM have been included directly after the corresponding rule, and appendices to AMC have been inserted directly after the corresponding AMC.

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**SUBPART A — GENERAL****M.A.202 External occurrence reporting**

- (a) Any person or organisation responsible in accordance with point M.A.201 shall report to the competent authority designated by the State of Registry, the organisation responsible for the type design or supplemental type design and, if applicable, the Member State of operator, any identified condition of an aircraft or component which endangers flight safety.
- (b) Reports shall be made in a manner established by the competent authority as defined in M.1 Agency and contain all pertinent information about the condition known to the person or organisation.
- (c) Where the person or organisation maintaining the aircraft is contracted by an owner or an operator to carry out maintenance, the person or the organisation maintaining the aircraft shall also report to the owner, the operator or the continuing airworthiness management organisation any such condition affecting the owner's or the operator's aircraft or component.
- (d) Reports shall be made as soon as practicable, but in any case within 72 hours of the person or organisation identifying the condition to which the report relates, unless exceptional circumstances prevent this.
- (e) Where relevant, the person or organisation shall produce a follow-up report to provide details of actions it intends to take to prevent similar occurrences in the future as soon as these actions have been identified. This report shall be produced in a form and manner established by the competent authority.

**AMC 1 M.A.202 External occurrence reporting**

- (a) Each report should contain, at least, the following information, as applicable:
  - (1) Reporter/Organisation name and approval reference;
  - (2) Information necessary to identify the subject aircraft and/or component;
  - (3) Date and time relative to any life or overhaul limitation in terms of flying hours/cycles/landings etc., as appropriate;
  - (4) Details of the condition as required by M.A.202(b); and
  - (5) Any other relevant information found during the evaluation or rectification of the condition.
- (b) For reports from organisations under the oversight of the Agency, the EASA technical occurrence report form, available on the EASA website, should be used.

**M.A.203 Means of compliance**

- (a) Alternative means of compliance to the AMC adopted by the Agency may be used to establish compliance with this Regulation and its Implementing Rules.
- (b) When a person responsible for continuing airworthiness in accordance with M.A.201(a), or independent certifying staff in accordance with M.A.801(b)(2) wishes to use an alternative means of compliance, he or she shall, prior to implementing it, provide the competent authority as defined in M.1 point 1 with a full description of the alternative means of compliance. The description shall include any revisions to manuals or procedures that may be relevant, as well as an assessment demonstrating that this Regulation is met.

- (c) The person may implement these alternative means of compliance subject to prior approval by the competent authority, and upon receipt of the notification as prescribed in M.B.104.
- (d) The approval of alternative means of compliance referred to in (c) is only valid for the individual person and aircraft concerned. Other persons wishing to use the same alternative means of compliance will need to apply for a new approval in accordance with (b).

### **AMC1 M.A.203 Means of compliance**

#### **DEMONSTRATION OF COMPLIANCE**

In order to demonstrate that the Implementing Rules are met, a risk assessment should be completed and documented. The result of this risk assessment should demonstrate that an equivalent level of safety to that established by the Acceptable Means of Compliance (AMC) adopted by the Agency is reached.

### **AMC1 M.A.301 -1 Continuing airworthiness tasks**

*Point 3 of the AMC is amended as below:*

- 3. In the case of commercial air transport, an operator should publish guidance to maintenance and flight personnel and any other personnel performing pre-flight inspection tasks, as appropriate, defining responsibilities for these actions and, where tasks are contracted to other organisations, how their accomplishment is subject to the management quality system of M.A.712. It should be demonstrated to the competent authority that pre-flight inspection personnel have received appropriate training for the relevant pre-flight inspection tasks. The training standard for personnel performing the pre-flight inspection should be described in the operator's continuing airworthiness management exposition.

### **M.A.302 Maintenance Programme**

*Points (c) and (g) are amended as below:*

- (c) Notwithstanding point (b) when ~~When~~ the aircraft maintenance programme is developed by a continuing airworthiness of the aircraft is managed by a continuing airworthiness management organisation approved in accordance with Section A, Subpart G of this Annex (Part M), the aircraft maintenance programme and its amendments may be approved by that continuing airworthiness management organisation subject to the following conditions: ~~through an indirect approval procedure.~~
  - (i) ~~In that case,~~ An the indirect approval procedure shall be established by the continuing airworthiness management organisation as part of the Continuing Airworthiness Management Exposition and shall be approved by the competent authority responsible for that continuing airworthiness management organisation.
  - (ii) The continuing airworthiness management organisation shall not use the ~~indirect~~ approval procedure when this organisation is not under the oversight of the Member State of Registry, unless an agreement exists in accordance with point M.1, paragraph 4(ii) or 4(iii), as applicable, transferring the responsibility for the approval of the aircraft maintenance programme to the competent authority responsible for the continuing airworthiness management organisation.

...

- (g) The aircraft maintenance programme shall be subject to periodic reviews and amended accordingly when necessary. These reviews will ensure that the programme continues to be valid in light of the operating experience and instructions from the competent authority whilst taking into account new and/or modified maintenance instructions promulgated by the type certificate and supplementary type certificate holders and any other organisation that publishes such data in accordance with Annex (Part-21) to Commission Regulation ~~(EC) No 1702/2003~~ (EU) No 748/2012.

## SUBPART D — MAINTENANCE STANDARDS

### **GM1 M.A. 401(d) Continuing airworthiness management**

Reference document for simplified English:

ASD Simplified Technical English for Aerospace and Defence (ASD-STE100).

## SUBPART F — MAINTENANCE ORGANISATION

### **M.A.601 Scope**

This Subpart establishes the requirements to be met by an organisation to qualify for the issue or continuation of ~~an approval~~ **an organisation certificate** for the maintenance of aircraft and components not listed in point M.A.201(g).

### ~~AMC M.A.601~~ **Scope**

~~An approved maintenance organisation may be approved to maintain aircraft/aircraft components not type certificated by the Agency.~~

### **M.A.602 Application for an organisation certificate**

~~An application for issue or change of a continuing airworthiness management organisation approval shall be made on a form and in a manner established by the competent authority.~~

- (a) The application for an organisation certificate or an amendment to an existing certificate shall be made in a form and manner established by the competent authority, taking into account the applicable requirements of this Regulation.
- (b) Applicants for an initial certificate shall provide the competent authority with documentation demonstrating how they will comply with the requirements established in this Regulation. Such documentation shall include a procedure describing how changes not requiring prior approval will be managed and notified to the competent authority.



**AMC1 M.A.602 Application for an organisation certificate**

An application should be made on an EASA Form 2 (Appendix IX to AMC M.A.602 and AMC M.A.702) or equivalent acceptable to the competent authority.

The EASA Form 2 is valid for the application for M.A. Subpart F, Part-145 and M.A. Subpart G organisations. Organisations applying for several ~~certificates approvals~~ may do so by using a single EASA Form 2.

**Appendix IX to AMC1 M.A.602 and AMC M.A.7021 EASA Form 2**

Page 1 of 2: no change

Page 2 of 2:

**SCOPE OF APPROVAL AVAILABLE**

CLASS	RATING	LIMITATION	BASE	LINE
AIRCRAFT	A1 Aeroplanes above 5700 kg	[Rating reserved to Maintenance Organisations approved in accordance with Annex II (Part-145)]  [State aeroplane manufacturer or group or series or type and/or the maintenance tasks]  <i>Example: Airbus A320 Series</i>	[YES/NO]*	[YES/NO]*
	A2 Aeroplanes 5700 kg and below	[State aeroplane manufacturer or group or series or type and/or the maintenance tasks]  <i>Example: DHC-6 Twin Otter Series</i>	[YES/NO]*	[YES/NO]*
	A3 Helicopters	[State helicopter manufacturer or group or series or type and/or the maintenance task(s)]  <i>Example: Robinson R44</i>	[YES/NO]*	[YES/NO]*
	A4 Aircraft other than A1, A2 and A3	[State aircraft group or series or type and/or the maintenance task(s).]	[YES/NO]*	[YES/NO]*
ENGINES	B1 Turbine	[State engine series or type and/or the maintenance task(s)] <i>Example: PT6A Series</i>		
	B2 Piston	[State engine manufacturer or group or series or type and/or the maintenance task(s)]		
	B3 APU	[State engine manufacturer or series or type and/or the maintenance task(s)]		
COMPONENTS OTHER THAN COMPLETE ENGINES	C1 Air Cond & Press	[State aircraft type or aircraft manufacturer or component manufacturer or the particular component		
	C2 Auto Flight			
	C3 Comms and Nav			
	C4 Doors - Hatches			

OR APUs	C5 Electrical Power & Lights	and/or cross refer to a capability list in the exposition and/or the maintenance task(s).]  <i>Example: PT6A Fuel Control</i>
	C6 Equipment	
	C7 Engine - APU	
	C8 Flight Controls	
	C9 Fuel	
	C10 Helicopter – Rotors	
	C11 Helicopter – Trans	
	C12 Hydraulic Power	
	C13 Indicating - recording system	
	C14 Landing Gear	
	C15 Oxygen	
	C16 Propellers	
	C17 Pneumatic & Vacuum	
	C18 Protection ice/rain/fire	
C19 Windows		
C20 Structural		
	C21 Water ballast	
	C22 Propulsion Augmentation	
SPECIALISED SERVICES	D1 Non-Destructive Testing	[State particular NDT method(s)]

EASA Form 2 Page 2 of 2

**M.A.603 Terms Extent of approval**

- (a) ~~An organisation involved in activities subject to this Subpart shall not exercise its activities unless approved by the competent authority.~~ Appendix V to Annex I (Part-M)

provides the template certificate for this approval.

- (b) The maintenance organisation's manual referred to in point M.A.604 shall specify the scope of work deemed to constitute approval. Appendix IV to Annex I (Part-M) defines all classes and ratings possible under Subpart F.
- (c) An approved maintenance organisation may fabricate, in conformity with maintenance data, a restricted range of parts for the use in the course of undergoing work within its own facilities, as identified in the maintenance organisation manual.

**AMC1 M.A.603(a) Terms Extent of approval**

The following table identifies the ATA Specification 2200 chapter for the category C component rating. If the maintenance manual (or equivalent document) does not follow the ATA Chapters, the corresponding subjects still apply to the applicable C rating.

CLASS	RATING	ATA CHAPTERS
COMPONENTS OTHER THAN COMPLETE ENGINES OR APUs		
	C1 Air Cond & Press	21
	C2 Auto Flight	22
	C3 Comms and Nav	23 - 34
	C4 Doors - Hatches	52
	C5 Electrical Power & Lights	24 - 33 - 85
	C6 Equipment	25 - 38 - 44 - 45 - 50
	C7 Engine - APU	49 - 71 - 72 - 73 - 74 - 75 - 76 - 77 - 78 - 79 - 80 - 81 - 82 - 83
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### **AMC1 M.A.603(c) Terms Extent of approval**

*Point 1 of the AMC is amended as below:*

1. ~~The agreement by the competent authority for the fabrication of parts by the approved maintenance organisation should be formalised through the approval of a detailed procedure in the maintenance organisation manual.~~ This AMC contains principles and conditions to be taken into account for the preparation of an acceptable procedure.

### **M.A.604 Maintenance organisation manual**

- (a) The maintenance organisation shall provide a manual containing **at least all of** the following information:
  1. a statement signed by the accountable manager to confirm that the organisation will continuously work in accordance with Part-M and the manual at all times, ~~and~~;
  2. the organisation's scope of work, ~~and~~;
  3. the organisation's management system and safety policy as specified in M.A.616;
  - ~~3.4.~~ the title(s) and name(s) of person(s) referred to in M.A.606(b), ~~and~~;
  - ~~4.5.~~ an organisation chart showing associated chains of responsibility between the person(s) referred to in M.A.606(b), ~~and~~;
  - ~~5.6.~~ a list of certifying staff with their scope of approval, and;
  - ~~6.7.~~ a list of locations where maintenance is carried out, together with a general description of the facilities,
  - ~~7. 8.~~ procedures specifying how the maintenance organisation ensures compliance with this Regulation Part, and;
  - ~~8. 9.~~ the maintenance organisation manual amendment procedure(s).
- (b) The maintenance organisation manual and its amendments shall be approved by the competent authority.
- (c) Notwithstanding paragraph (b), minor amendments to the manual may be managed in accordance with the procedure established as provided in M.A.602(b) **be approved through a procedure** (hereinafter referred to as amendments not requiring prior approval ~~called indirect approval~~).

**AMC1 M.A.604 Maintenance organisation manual**

1. **Appendix IV to this AMC** provides an outline of the format of an acceptable maintenance organisation manual for an ~~small~~ organisation with less than 10 maintenance staff (FTEs).
2. The maintenance organisation exposition as specified in Part-145 provides an outline of the format of an acceptable maintenance organisation manual for larger organisations with more than 10 maintenance staff (FTEs) ~~, dependent upon the complexity of the organisation.~~

**M.A.606 Personnel requirements**

- (a) The organisation shall appoint an accountable manager, who has corporate authority for ensuring that all maintenance required by the customer can be financed and carried out to the standard required by **Regulation Part**.
- (b) A person or group of persons shall be nominated with the responsibility of ensuring that the organisation is always in compliance with this Subpart. Such person(s) shall be ultimately responsible to the accountable manager.
- (c) All paragraph (b) persons shall be able to show relevant knowledge, background and appropriate experience related to aircraft and/or component maintenance.
- (d) The organisation shall have appropriate staff for the normal expected contracted work. The use of temporarily ~~sub~~contracted staff is permitted in the case of higher than normally expected contracted work and only for personnel not issuing a certificate of release to service.
- (e) The qualification of all personnel involved in maintenance shall be demonstrated and recorded.
- (f) Personnel who carry out specialised tasks such as welding, non-destructive testing/inspection other than colour contrast shall be qualified in accordance with an officially recognised standard.
- (g) The maintenance organisation shall have sufficient certifying staff to issue M.A.612 and M.A.613 certificates of release to service for aircraft and components. They shall comply with the requirements of ~~Part 66~~ **M.A.607**.
- ~~(h) By derogation from paragraph (g), the organisation may use certifying staff qualified in accordance with the following provisions when providing maintenance support to operators involved in commercial operations, subject to appropriate procedures to be approved as part of the organisation's manual:~~
  - ~~1. For a repetitive pre-flight airworthiness directive which specifically states that the flight crew may carry out such airworthiness directive, the organisation may issue a limited certifying staff authorisation to the aircraft commander on the basis of the flight crew licence held, provided that the organisation ensures that sufficient practical training has been carried out to ensure that such person can accomplish the airworthiness directive to the required standard;~~
  - ~~2. In the case of aircraft operating away from a supported location the organisation may issue a limited certifying staff authorisation to the aircraft commander on the basis of the flight crew licence, provided that the organisation ensures that sufficient practical training has been carried out to ensure that such person can accomplish the task to the required standard.~~

**AMC1 M.A.606(b) Personnel requirements**

1. Dependent upon the size of the organisation, the functions may be subdivided

under individual managers or combined in any number of ways.

2. The maintenance organisation should have, dependent upon the extent of approval, an aircraft maintenance manager, a workshop manager all of whom should report to the accountable manager. In small maintenance organisations any manager may also be the accountable manager, and may also be the aircraft maintenance manager or the workshop manager.
3. The aircraft maintenance manager is responsible for ensuring that all maintenance required to be carried out, plus any defect rectification carried out during aircraft maintenance, is carried out to the design and ~~quality~~ standards specified in **Regulation Part**. The aircraft maintenance manager is also responsible for any corrective action resulting from the M.A.616 **management system organisational review**.
4. The workshop manager is responsible for ensuring that all work on aircraft components is carried out to the standards specified in **Regulation Part** and also responsible for any corrective action resulting from the M.A.616 **management system organisational review**.
5. Notwithstanding the example sub-paragraphs 2 - 4 titles, the organisation may adopt any title for the foregoing managerial positions but should identify to the competent authority the titles and persons chosen to carry out these functions.

#### **AMC1 M.A.606(c) Personnel requirements**

*Point 1 of the AMC is amended as below:*

1. All nominated persons should, ~~in the normal way, be expected to satisfy the competent authority that they~~ possess the appropriate experience and qualifications which are listed in paragraphs 2.1 to 2.5 below.

#### **AMC1 M.A.606(d) Personnel requirements**

1. All **contracted** staff are subjected to compliance with the organisation's procedures specified in the maintenance organisation manual relevant to their duties.
2. To have sufficient staff means that the approved maintenance organisation employs or contracts staff directly, even on a volunteer basis, for the anticipated maintenance workload.
3. Temporarily ~~sub~~contracted means the person is employed by another organisation and contracted by that organisation to the approved maintenance organisation.

#### **AMC1 M.A.606(f) Personnel requirements**

In point 2, an editorial correction has been made:

2. Appropriately qualified means to level 1, 2 or 3 as defined by European Standard EN 4179 ~~dependant~~ **dependent** upon the non-destructive testing function to be carried out.
3. ....

#### **M.A.607 Certifying staff**

- (a) **Certifying staff shall comply with Part-66 except for certifying staff referred to in article 5(6).**

- (a)(b) In addition to M.A.606(g), c Certifying staff can only exercise their privileges, if the organisation has ensured:
- (1) ~~that certifying staff can demonstrate that they meet the requirements of point 66.A.20(b) of Annex III (Part 66), except when Annex III (Part 66) refers to Member State regulation, in which case they shall meet the requirement of such regulation, and;~~
  - (2) ~~that certifying staff~~ they have an adequate understanding of the relevant aircraft and/or aircraft component(s) to be maintained together with the associated organisation procedures.
- (b)(c) In the following unforeseen cases, where an aircraft is grounded at a location other than the main base where no appropriate certifying staff is available, the ~~maintenance organisation contracted to provide maintenance support~~ may issue a one-off certification authorisation:
- (1) to one of its employees holding type qualifications on aircraft of similar technology, construction and systems; or
  - (2) to any person with not less than three years maintenance experience and holding a valid ICAO aircraft maintenance licence rated for the aircraft type requiring certification provided there is no organisation appropriately approved under Regulation Part at that location and the contracted organisation obtains and holds on file evidence of the experience and the licence of that person.
- All such cases must be reported to the competent authority within seven days of the issuance of such certification authorisation. The ~~approved maintenance~~ organisation issuing the one-off certification authorisation shall ensure that any such maintenance that could affect flight safety is re-checked.
- (d) By derogation from paragraph (a), the organisation may use certifying staff qualified in accordance with the following provisions when providing maintenance support to operators involved in commercial operations, subject to appropriate procedures to be approved as part of the organisation's manual:
- (1) For a repetitive pre-flight airworthiness directive which specifically states that the flight crew may carry out such airworthiness directive, the organisation may issue a limited certifying staff authorisation to the aircraft commander on the basis of the flight crew licence held, provided that the organisation ensures that sufficient practical training has been carried out to ensure that such person can accomplish the airworthiness directive to the required standard;
  - (2) In the case of aircraft operating away from a supported location, the organisation may issue a limited certifying staff authorisation to the aircraft commander on the basis of the flight crew licence, provided that the organisation ensures that sufficient practical training has been carried out to ensure that such person can accomplish the task to the required standard.
- (e)(e) The ~~approved maintenance~~ organisation shall record all details concerning certifying staff and maintain a current list of all certifying staff together with their scope of approval as part of the organisation's manual pursuant to point M.A.604(a)5 6.

#### **AMC1 M.A.607 (b)(1) Certifying staff**

- (a) All prospective certifying staff are required to be assessed for competence, qualification, and capability related to intended certifying duties. Competence and capability can be assessed by having the person work under the supervision of another certifying person for sufficient time to arrive at a conclusion. Sufficient time could be as little as a few weeks if the person is fully exposed to relevant work. The person need not be assessed against the complete spectrum of intended duties. When the person has been recruited from another approved maintenance



organisation and was a certifying person in that organisation, then it is reasonable to accept a written confirmation from the previous organisation.

- (b) The organisation should hold copies of all documents that attest qualification, and recent experience.

### **AMC ~~M.A.607~~ GM1 M.A.607(b)(2) Certifying staff**

1. Adequate understanding of the relevant aircraft and/or aircraft component(s) to be maintained together with the associated organisation procedures means that the person has received training and has relevant maintenance experience on the product type and associated organisation procedures such that the person understands how the product functions, what are the more common defects with associated consequences.
- ~~2. All prospective certifying staff are required to be assessed for competence, qualification and capability related to intended certifying duties. Competence and capability can be assessed by having the person work under the supervision of another certifying person for sufficient time to arrive at a conclusion. Sufficient time could be as little as a few weeks if the person is fully exposed to relevant work. The person need not be assessed against the complete spectrum of intended duties. When the person has been recruited from another approved maintenance organisation and was a certifying person in that organisation then it is reasonable to accept a written confirmation from the previous organisation.~~
- ~~3. The organisation should hold copies of all documents that attest to qualification, and to recent experience.~~

### **AMC1 M.A.606(h)2-607(d)(2) Personnel requirements**

1. For the issue of a limited certification authorisation the commander should hold either a valid air transport pilot license (ATPL), or commercial pilots license (CPL) ~~or a national equivalent acceptable to the competent authority on the aircraft type.~~ In addition, the limited certification authorisation is subject to the maintenance organisation manual containing procedures to address the following:
  - a. Completion of adequate maintenance airworthiness regulation training.
  - b. Completion of adequate task training for the specific task on the aircraft. The task training should be of sufficient duration to ensure that the individual has a thorough understanding of the task to be completed and should involve training in the use of associated maintenance data.
  - c. Completion of the procedural training.

The above procedures should be specified in the maintenance organisation manual and be accepted by the competent authority.
2. Typical tasks that may be certified and/or carried out by the commander holding an ATPL or CPL are minor maintenance or simple checks included in the following list:
  - a. Replacement of internal lights, filaments and flash tubes.
  - b. Closing of cowlings and refitment of quick access inspection panels.
  - c. Role changes, e.g., stretcher fit, dual controls, FLIR, doors, photographic equipment, etc.
  - d. Inspection for and removal of de-icing/anti-icing fluid residues, including

removal/closure of panels, cowls or covers that are easily accessible but not requiring the use of special tools.

- e. Any check/replacement involving simple techniques consistent with this AMC and as agreed by the competent authority.
3. The validity of the authorisation should be limited to ~~have a finite life of~~ twelve months and may be renewed subject to satisfactory re-current training on the applicable aircraft type

**~~AMC M.A.607 (e)~~ AMC1 M.A.607(e) Certifying staff**

1. The following minimum information as applicable should be kept on record in respect of each certifying person:
  - (a) name;
  - (b) date of birth;
  - (c) basic training;
  - (d) type training;
  - (e) recurrent training;
  - (f) specialised training;
  - (g) experience;
  - (h) qualifications relevant to the approval;
  - (i) scope of the authorisation and personal authorisation reference;
  - (j) date of first issue of the authorisation; and
  - (k) if appropriate - expiry date of the authorisation.
2. Persons authorised to access the system should be maintained at a minimum to ensure that records cannot be altered in an unauthorised manner or that such confidential records become accessible to unauthorised persons.
3. The competent authority should be granted access to the records upon request.

**AMC1 M.A.610 Maintenance work orders**

A written work order may take the form of, but not limited to, the following:

- A formal document or form specifying the work to be carried out. This form may be provided by the continuing airworthiness management organisation managing the aircraft, or by the maintenance organisation undertaking the work, or by the owner/operator himself.
- An entry in the aircraft log book specifying the defect that needs to be corrected.

**AMC1 M.A.613 (a) Component certificate of release to service**

*Points 2.6.2 and 2.8 are amended as follows:*

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

~~from the maintenance organisation approved under M.A Subpart F who retains control of the airworthiness status of the components. An EASA Form 1 may be issued and should contain the information as specified in paragraph 2.4 including the aircraft from which the aircraft component was removed.~~

2.6.2 Serviceable aircraft components removed from a non-Member State registered aircraft may only be issued with an EASA Form 1 under the following conditions:

- (a) the components have been leased or loaned from an organisation approved under Annex I or Annex II to Commission Regulation (EC) No 2042/2003;
- (b) the organisation leasing/loaning the components retains full control of the airworthiness status of the components; and
- (c) the organisation issuing the EASA Form 1 has access to the complete airworthiness status of the components, including during the lease/loan.

An EASA Form 1 may be issued and should contain the information as specified in paragraph 2.4, including the aircraft from which the aircraft component was removed.

....

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

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

- (a) dismantling the component for sufficient inspection in accordance with the appropriate maintenance data,
- (b) replacing of all service life-limited components when no satisfactory evidence of life used is available and/or the components are in an unsatisfactory condition,
- (c) reassembling and testing as necessary the component,
- (d) completing all certification requirements as specified in M.A.613.

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

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

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

- ~~BASA/MIP-G Maintenance Implementation Procedures Guidance (USA),~~

- ~~AAM-G Administrative Arrangement on Maintenance Guidance (Canada).~~
- BASA/EASA-FAA MAG Maintenance Annex Guidance (USA),
- BASA/ EASA-TCCA Maintenance Annex Guidance (Canada).

### **AMC1 M.A.615(b) Privileges of the organisation**

- (a) M.A.615(b) refers to work carried out by another organisation which is not appropriately approved under M.A. Subpart F or Part-145 to carry out such tasks. The intent is to permit the acceptance of specialised maintenance services, such as, but not limited to, non-destructive testing, surface treatment, heat-treatment, welding, fabrication of specified parts for minor repairs and modifications, etc., without the need of Subpart F approval for those tasks.
- (b) The requirement that the organisation performing the specialised services must be 'appropriately qualified' means that it should meet an officially recognised technical standard appropriate to the work to be carried out or, otherwise, it should be acceptable to the competent authority (through the approval of the Maintenance Organisation Manual).
- (c) 'Under the control of the Subpart F organisation' means that the Subpart F organisation should investigate the capability of the subcontracted organisation (including qualifications, facilities, equipment, and materials) and ensure that such organisation:
- (1) Receives appropriate maintenance instructions and maintenance data for the task to be performed;
  - (2) Properly records the maintenance performed in the Subpart F airworthiness records; and
  - (3) Notifies the Subpart F organisation for any deviation or non-conformity, which has arisen during such maintenance.
- (d) The certificate of release to service may be issued either at the subcontractors or at the organisation facility by authorised certifying staff, and always under the M.A. Subpart F organisation reference. Such staff would normally come from the M.A. Subpart F organisation but may otherwise be a person from the subcontractor who meets the M.A. Subpart F organisation certifying staff standard which itself is approved by the competent authority via the Maintenance Organisation Manual.
- (e) For subcontracted organisations certified in accordance with industry management system standards, such as ISO 9001 or EN 9110, the Subpart F organisation should specify if, and how, it intends to consider this certification in its subcontractor control procedures.
- (f) Subcontracted specialised services organisations should be listed in the Maintenance Organisation Manual of the Subpart F organisation together with their qualifications, and the associated control procedures.

**M.A.616 Organisational review Management system**

~~To ensure that the approved maintenance organisation continues to meet the requirements of this Subpart, it shall organise, on a regular basis, organisational reviews.~~

- (a) The organisation shall establish, implement, and maintain a management system that includes:
- (1) clearly defined lines of responsibility and accountability throughout the organisation, including a direct safety accountability of the accountable manager;
  - (2) a description of the overall philosophies and principles of the organisation with regard to safety, referred to as the safety policy;
  - (3) the identification of aviation safety hazards entailed by the activities of the organisation, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness;
  - (4) maintaining personnel trained and competent to perform their safety management related duties and tasks;
  - (5) documentation of all management system key processes, including a process for making personnel aware of their responsibilities and the procedure for amending this documentation;
  - (6) a function to monitor compliance of the organisation with the relevant requirements. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary; and
  - (7) any additional requirements that are prescribed in this Regulation.
- (b) The management system shall correspond to the size of the organisation, and the nature and complexity of its activities, taking into account the hazards and associated risks inherent in these activities.
- (c) Where the organisation holds one or more additional organisation certificates within the scope of Regulation (EC) 216/2008, the management system may be combined or integrated with that required under the additional certificate (s) held.
- (d) Notwithstanding point (a)(6), organisations with no more than 10 maintenance staff (FTEs) may replace the compliance monitoring function by regular organisational reviews subject to the approval of the competent authority.

**AMC1 M.A.616(a) Management system**

- (a) Safety risk management may be performed using hazard checklists, or similar risk management tools, or processes which are integrated into the activities of the organisation.
- (b) The organisation should manage safety risks related to a change. The management of change should be a documented process to identify external and internal change that may have an adverse effect on safety. It should make use of the organisation's existing hazard identification, risk assessment, and mitigation processes.
- (c) The organisation should identify a person who fulfils the role of safety manager, and who is responsible for coordinating all safety management related processes and tasks. This person may be the accountable manager, or a person with an operational role in the organisation.
- (d) Within the organisation, responsibilities should be identified for hazard identification,

risk assessment, and mitigation.

- (e) The safety policy should include a commitment to improve towards the highest safety standards, comply with all applicable legal requirements, meet all applicable standards, consider best practices, and provide appropriate resources.
- (f) The organisation should, in cooperation with other stakeholders, develop, coordinate, and maintain an emergency response plan (ERP) that ensures orderly and safe transition from normal to emergency operations, and return to normal operations. The ERP should provide the actions to be taken by the organisation or specified individuals in an emergency and reflect the size, nature, and complexity of the activities performed by the organisation.

### **GM1 M.A.616(a)(1) Management system**

#### **SAFETY MANAGER**

- (a) Depending on the size of the organisation, and the nature, and complexity of its activities, the person fulfilling the role of safety manager may be assisted by additional safety personnel for the performance of all safety management related tasks.
- (b) Regardless of the organisational set-up, it is important that the person fulfilling the role of safety manager remains the unique focal point as regards the development, administration, and maintenance of the organisation's safety management system

### **GM1 M.A.616 (a)(2) Management system**

#### **SAFETY POLICY**

The safety policy is the means whereby the organisation states its intention to maintain and, where practicable, improve safety levels in all its activities, and to minimise its contribution to the risk of an aircraft accident as far as is reasonably practicable.

The safety policy should state that the purpose of safety reporting and internal investigations is to improve safety, not to apportion blame to individuals.

### **AMC1 M.A.616 (a)(3) Management system**

#### **INTERNAL SAFETY REPORTING SCHEME**

- (a) As part of its management system, the organisation should establish an internal safety reporting scheme to enable the collection and evaluation of such occurrences to be reported under M.A.202.
- (b) The scheme shall also enable the collection and evaluation of those errors, near-misses, and hazards reported internally that do not fall under point (a) above.

Through this scheme the organisation should:

- (1) identify and address the factors contributing to occurrences in order to reduce the likelihood of reoccurrence;
  - (2) identify adverse trends, corrective actions taken or to be taken by the organisation to address deficiencies; and
  - (3) ensure evaluation of all known relevant information relating to errors, near-misses and hazards, and a method to circulate the information as necessary.
- (c) The internal safety reporting scheme should be confidential and enable and encourage

free and frank reporting of any potentially safety related occurrence, including incidents such as errors or near-misses, safety issues, and hazards identified. This will be facilitated by the establishment of a just culture. An organisation should ensure that personnel are not inappropriately punished for reporting or cooperating with occurrence investigations.

The internal safety reporting scheme should contain the following elements:

- (1) clearly identified aims and objectives with demonstrable corporate commitment;
  - (2) a just culture policy and process identified and published;
  - (3) an investigation process to:
    - (i) identify those reports which require further investigation; and
    - (ii) establish all root causes, including any technical, organisational, managerial, or human factors issues, and any other contributing factors relating to the event; and
  - (4) appropriate corrective actions based on investigation findings.
- (d) The internal reporting scheme should:
- (1) assure confidentiality to the reporter;
  - (2) be closed-loop, to ensure that actions are taken internally to address any safety issues and hazards; and
  - (3) feed into the organisation's safety training, whilst maintaining appropriate confidentiality;
- (e) Feedback should be given to reportees both on an individual and more general basis to ensure their continued support of the occurrence reporting scheme.

### **GM1 M.A.616 (a)(3) Management system**

#### **DEFINITIONS - INTERNAL OCCURRENCE REPORTING SCHEME**

1. Near-miss: An occurrence which under slightly different circumstances could have led to an aircraft incident or accident.

An example is when a mechanic on rechecking his/her work at the end of a task realises that a pipe was only connected hand tight.

2. Error: Non-intentional action or inaction by a person that may lead to deviations from accepted procedures or regulations.

Errors are often associated with occasions where a planned sequence of mental or physical activities either fails to achieve its intended outcome, or is not appropriate with regard to the intended outcome, and when results cannot be attributed to the intervention of some chance agency. The mechanic forgetting to tighten the pipe was an error.

3. Hazard: A condition that could cause or contribute to an aircraft incident or accident.

Hazards can be related to human performance, the environment, organisational factors (commercial pressure, resource constraints, and culture) or technical factors (design of aircraft, systems, tooling, and equipment).

An example related to human performance is that of complex maintenance performed at time of night with circadian low.

Examples related to the environment are: line maintenance at night, excessive noise, and maintenance outside of hangar with very low temperatures.

Examples of organisational factors are: maintenance work involving multiple contractors/subcontractors, and significant turnover rate regarding maintenance and supervisory staff.

Examples related to technical factors are: ambiguous maintenance data, use of alternative tooling different from that recommended in maintenance data, and use of modified maintenance instructions.

4. Safety Culture: An enduring set of values, norms, attitudes, and practices within an organisation concerned with minimising exposure of the workforce and the general public to dangerous or hazardous conditions. In a positive safety culture, a shared concern for, commitment to, and accountability for safety is promoted.
5. Just Culture: A culture in which front line operators or others are not punished for actions, omissions or decisions taken by them that are commensurate with their experience and training, but where gross negligence, wilful violations and destructive acts are not tolerated.

#### **AMC1 M.A.616 (a)(4) Management system**

##### TRAINING AND COMMUNICATION ON SAFETY

###### (a) Training

- (1) All personnel should receive safety training as appropriate for their safety responsibilities.
- (2) Adequate records of all safety training provided should be kept.

###### (b) Communication

- (1) The organisation should establish communication about safety matters that:
  - (i) ensures that all personnel are aware of the safety management activities as appropriate for their safety responsibilities;
  - (ii) conveys safety critical information, especially relating to assessed risks and analysed hazards;
  - (iii) explains why particular actions are taken; and
  - (iv) explains why safety procedures are introduced or changed.
- (2) Regular meetings with personnel where information, actions, and procedures are discussed, may be used to communicate safety matters.

#### **GM1 M.A.616(a)(4) Management system**

##### TRAINING AND COMMUNICATION ON SAFETY

The safety training programme may consist of self-instruction via a media (newsletters, flight safety magazines), classroom training, e-learning, or similar training provided by training service providers.



**GM1 M.A.616(a)(5) Management system****ORGANISATION'S MANAGEMENT SYSTEM DOCUMENTATION**

- (a) It is not required to duplicate information in several manuals. The information may be contained in the maintenance organisation manual.
- (b) The organisation may also choose to document some of the information required to be documented in separate documents (e.g. procedures). In this case, it should ensure that the maintenance organisation manual contains adequate references to any document kept separately. Any such documents are then to be considered an integral part of the organisation's management system documentation.

**AMC1 M.A.616(a)(6) Management system****COMPLIANCE MONITORING FUNCTION**

- (a) Compliance monitoring
  - (1) The primary objective of the compliance monitoring function is to enable the organisation to ensure that it remains in compliance with the applicable requirements.
  - (2) Compliance monitoring through independent audits is an essential element of the management system.
- (b) The independence of the compliance monitoring function should be established by ensuring that audits and inspections are carried out by personnel not responsible for the function, procedure, or products being audited.
- (c) The implementation and use of a compliance monitoring function should enable the organisation to monitor compliance with the relevant requirements of this Part and other applicable Parts.
  - (1) The organisation should specify the basic structure of the compliance monitoring function applicable to the activities conducted.
  - (2) The compliance monitoring function should be structured according to the size of the organisation, and the complexity of the activities to be monitored.
- (d) The organisation should monitor compliance with the procedures it has designed to ensure safe activities. In doing so, it should as a minimum, and where appropriate, monitor compliance with:
  - (1) privileges of the organisation;
  - (2) maintenance procedures;
  - (3) training standards; and
  - (4) management system procedures and manuals.
- (e) The organisation should implement an audit planning cycle not exceeding 12 months, during which all management system key processes, maintenance procedures, and products should be completely audited against the applicable requirements. When determining the audit planning cycle, the organisation should consider the results of its safety risk assessment, and of past compliance monitoring in order to adapt the audit planning to the level of risk identified.
- (f) Notwithstanding point (e), the competent authority may agree to increase the audit planning cycle by up to 100 % provided that there are no safety critical findings, and subject to being satisfied that the organisation has a good record of rectifying findings in a timely manner.

**(g) Training**

- (1) Correct and thorough training is essential to optimise compliance in every organisation. In order to achieve significant outcomes of such training, the organisation should ensure that all personnel understand the objectives as laid down in the organisation's management system documentation.
- (2) Those responsible for managing the compliance monitoring function should receive training on this task. Such training should cover the requirements of compliance monitoring, manuals and procedures related to the task, audit techniques, reporting, and recording.
- (3) Time should be provided to train all personnel involved in compliance management, and for briefing the remainder of the personnel.
- (4) The allocation of time and resources should be governed by the volume and complexity of the activities concerned.

**AMC1 M.A.616(d) Management system ~~Organisational review~~ \*(see also Appendix VIII to AMC1 M.A.616(d))**

1. (a) The primary objectives of the organisational review are to enable the approved maintenance organisation to ensure that it can deliver a safe product and that approved maintenance organisation remains in compliance with the requirements.
2. (b) The approved maintenance organisation should identify all of the below:
  - 2.1. (1) the person responsible for the organisational review, and;
  - 2.2. (2) the frequency of the reviews, and;
  - 2.3. (3) the scope and content of the reviews, and;
  - 2.4. (4) the persons accomplishing the reviews, and;
  - 2.5. (5) the procedure for planning, performing and processing review findings.
  - 2.6. (6) the procedure for ensuring corrective actions are carried out within the appropriate time frame.
3. ~~The organisation quality system as specified in Part 145 provides an acceptable basic structure for the organisational review system for organisations with more than 10 maintenance staff, dependent upon the complexity of the organisation.~~
- (c) 4. Appendix VIII to AMC1 M.A.616(d) should be used to manage the organisational reviews.

**Appendix VIII to AMC1 M.A.616(d) Management system**

~~This is only applicable to organisations with less than 10 maintenance staff members. For larger organisations, the principles and practices of an independent quality system should be used.~~

Depending on the complexity of the small organisation (number and type of aircraft, number of different fleets, subcontracting of specialised services, etc.), the organisational review system may vary from a system using the principles and practices of a compliance monitoring quality system (except for the requirement of independence) to a simplified system adapted to the low complexity of the organisation and the aircraft maintained

managed.

As a core minimum, the organisational review system should have the following features, which should be described in the Maintenance Organisation Manual (MOM):

- a. Identification of the person responsible for the organisational review programme.

By default, this person should be the accountable manager, unless he/she delegates this responsibility to (one of) the M.A.606(b) person(s).

- b. Identification and qualification criteria for the person(s) responsible for performing the organisational reviews.

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

- c. Elaboration of the organisational review programme:

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

- d. Performance of organisational reviews

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

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

- e. Management of non-compliances findings and occurrence reports.

- All non-compliances findings should be recorded and notified to the affected persons.
- All non-compliances findings ~~that lower safety or seriously hazard flight safety~~ in the sense of M.A.619(a), should be immediately notified to the competent authority and all necessary actions on aircraft in service should be immediately taken.
- ~~All occurrence reports should be reviewed with the aim for continuous improvement of the system by identifying possible corrective and preventive~~

~~actions. This should be done in order to find prior indicators (e.g., notified difficulties in using current procedures and tools, systematic deviations from procedures, unsafe behaviours, etc.), and dismissed alerts that, had they been recognised and appropriately managed before the event, could have resulted in the undesired event being prevented.~~

- Corrective and preventive actions should be approved by the person responsible for the organisational review programme and implemented within a specified time frame.
- Once the person responsible for the organisational review programme is satisfied that the corrective action is effective, closure of the finding should be recorded along with a summary of the corrective action.
- The accountable manager should be notified of all significant findings and, on a regular basis, of the global results of the organisational review programme.

The following provides is a typical example of a simplified organisational review checklist, to be adapted as necessary to cover the MOM procedures:

### **1 – Scope of work**

Check that:

- All aircraft and components under maintenance or under contract are covered in the EASA Form 3.
- The scope of work in the MOM is covered by the ~~does not disagree with the~~ EASA Form 3.
- No work has been performed outside the scope of the EASA Form 3 and the MOM.

### **2 - Maintenance data**

- Check that maintenance data to cover the aircraft/component in the scope of work of the MOM are available ~~present~~ and up to date.
- Check that no change has been made to the maintenance data from the TC holder without being notified.

### **3 – Equipment and Tools**

- Check the equipment and tools against the lists in the MOM and check if still appropriate to the TC holder's instructions.
- Check tools for proper calibration (sample check).

### **4 – Stores**

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

**5 – Certification of maintenance**

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

**6 – Relations with the owners/operators**

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

**7 – Personnel**

- Check that the ~~current~~ accountable manager and other nominated persons are correctly identified in the approved MOM.
- If the number of personnel has decreased or if the activity has increased, check that ~~the~~ staff are still adequate to ensure a ~~safe product~~ safety.
- Check that the ~~qualifications~~ of all new personnel (or personnel with new functions) ~~have~~ been appropriately assessed.
- Check that ~~the~~ staff have been trained, as necessary, to cover changes in:
  - regulations,
  - competent authority publications,
  - the MOM and associated procedures,
  - the products in the scope of work,
  - maintenance data (significant ADs, SBs, etc.).

**8 – ~~Contracted m~~Maintenance ~~contracted~~**

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

**9 – ~~Subcontracted m~~Maintenance ~~subcontracted~~**

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

**10 – ~~Technical Maintenance~~ records and record keeping**

- Have the maintenance actions been properly recorded?
- Have the certificates (~~EASA~~ Form 1 and/or ~~Certificates of~~ Conformity certificates) been properly collected and recorded?
- Perform a sample check of ~~technical maintenance~~ records to ensure completeness and ~~preservation storage~~ during the appropriate periods.
- Is storage of ~~electronic computerised~~ data properly ensured?

**11 – ~~Internal safety occurrence-reporting~~ procedures**

- Check that reporting is properly performed.
- Actions taken and recorded.

**12 – Safety management**

- Check that there is a hazard log and risk register, or equivalent document, and that they are up to date,
- Check the management system is being reviewed by the Accountable Manager and Safety Manager for its effectiveness,
- Check that any organisational changes have been documented, and appropriate hazard and risk assessments have been carried out,
- Check that there is an ERP in place, and it is up to date,
- Check that any risk mitigations or preventive actions are being applied and are effective.

**AMC2 M.A.616(d) Management system****INDUSTRY STANDARDS**

A management system certified in accordance with ISO 9001 or EN 9110 is deemed to meet the intent of organisational review, provided that the organisational review programme under ISO 9001 or EN 9110 does not exceed 12 months.

**M.A.617 Changes to the ~~approved maintenance~~ organisation**

~~In order to enable the competent authority to determine continued compliance with this Part, the approved maintenance organisation shall notify it of any proposal to carry out any of the following changes, before such changes take place:~~

- ~~1. the name of the organisation;~~
- ~~2. the location of the organisation;~~
- ~~3. additional locations of the organisation;~~

4. ~~the accountable manager;~~
5. ~~any of the persons specified in paragraph M.A.606(b);~~
6. ~~the facilities, equipment, tools, material, procedures, work scope and certifying staff that could affect the approval.~~

~~In the case of proposed changes in personnel not known to the management beforehand, these changes shall be notified at the earliest opportunity.~~

(a) Any change affecting:

- (1) the scope of the certificate or the terms of approval of the organisation, or
- (2) any of the elements of the organisation's management system as required in M.A.616 (a)(1) and (a)(2),

shall require prior approval by the competent authority.

- (b) For any changes requiring prior approval in accordance with (a), the organisation shall apply for and obtain an approval issued by the competent authority. The application shall be submitted before any such change takes place, in order to enable the competent authority to determine continued compliance with this Regulation, and to amend, if necessary, the organisation certificate and related terms of approval attached to it.

The organisation shall provide the competent authority with any relevant documentation.

The change shall only be implemented upon receipt of formal approval by the competent authority in accordance with M.B.606.

The organisation shall operate under the conditions prescribed by the competent authority during such changes as applicable.

- (c) All changes not requiring prior approval shall be managed and notified to the competent authority as defined in the procedure referred to in M.A.602(b) and approved by the competent authority in accordance with M.B.602(h).

### **AMC1 M.A.617 Changes to the organisation**

#### APPLICATION TIME FRAMES

- (a) The application for the amendment of an organisation certificate should be submitted at least 30 days before the date of the intended changes.
- (b) In the case of a planned change of a nominated person, the organisation should inform the competent authority at least 10 days before the date of the proposed change.
- (c) Unforeseen changes should be notified at the earliest opportunity, in order to enable the competent authority to determine continued compliance with the applicable requirements and to amend if necessary, the organisation certificate and related terms of approval.

### **GM1 M.A.617(a) Changes to the organisation**

#### GENERAL

- (a) Typical examples of changes that may affect the certificate or the terms of approval are listed below:
  - (1) the name of the organisation;

- (2) the organisation's principal place of business;
  - (3) the organisation's scope of approval;
  - (4) additional locations of the organisation;
  - (5) the accountable manager;
  - (6) any of the persons referred to in M.A.606(b);
  - (7) the organisation's documentation as required by Regulation Part, safety policy, and procedures; and
  - (8) the facilities, equipment, tools, material, procedures, or work scope.
- (b) Prior approval by the competent authority is required for any changes to the organisation's procedure describing how changes not requiring prior approval will be managed, and notified to the competent authority.
- (c) Changes requiring prior approval may only be implemented upon receipt of formal approval by the competent authority.

### **GM2 M.A.617(a) Changes to the organisation**

#### **CHANGE OF NAME OF THE ORGANISATION**

A change of name requires the organisation to submit a new application as a matter of urgency.

Where this is the only change to report, the new application can be accompanied by a copy of the documentation previously submitted to the competent authority under the previous name, as a means of demonstrating how the organisation complies with the applicable requirements.

#### **M.A.618 Continued validity of approval**

- (a) ~~An approval shall be issued for an unlimited duration. It~~ The organisation's certificate shall remain valid subject to:
1. the organisation remaining in compliance with this Regulation Part, taking into account in accordance with the provisions related to the handling of findings as specified under M.A.619, and;
  2. the competent authority being granted access to the organisation to determine continued compliance with the relevant requirements of this Regulation this Part, and;
  3. the approval certificate not being surrendered or revoked;
- (b) Upon ~~revocation or surrender~~ ~~surrender or revocation~~, the approval certificate shall be returned to the competent authority without delay.

#### **M.A.619 Findings**

- (a) ~~A level 1 finding is any significant non-compliance with Part M requirements which lowers the safety standard and hazards seriously the flight safety.~~
- (b) ~~A level 2 finding is any non-compliance with the Part M requirements which could lower the safety standard and possibly hazard the flight safety.~~
- (c) ~~After receipt of notification of findings according to M.B.605, the holder of the maintenance organisation approval shall define a corrective action plan and demonstrate corrective action to the satisfaction of the competent authority within a period agreed with this authority~~



After receipt of notification of findings according to M.B.605, the organisation shall:

- (a) identify the root cause of the non-compliance;
- (b) define a corrective action plan; and
- (c) demonstrate corrective action implementation to the satisfaction of the competent authority within a period agreed with that authority as defined in M.B.605.

### **AMC1 M.A.619 Findings**

#### GENERAL

The corrective action plan defined by the organisation should address the effects of the non-compliance, as well as its root cause(s) and contributing factors.

### **GM1 M.A.619 Findings**

#### GENERAL

- (a) Preventive action is the action to eliminate the cause of a potential non-compliance, or other undesirable potential situation
- (b) Corrective action is the action to eliminate, or mitigate the root cause(s) and prevent recurrence of an existing detected non-compliance, or other undesirable condition, or situation. Proper determination of the root cause is crucial for defining effective corrective actions to prevent reoccurrence.
- (c) Correction is the action to eliminate a detected non-compliance.

### **M.A.620 Means of compliance**

- (a) Alternative means of compliance to the AMC adopted by the Agency may be used by an organisation to establish compliance with this Regulation .
- (b) When an organisation wishes to use an alternative means of compliance, it shall, prior to implementing it, provide the competent authority with a full description of the alternative means of compliance. The description shall include any revisions to manuals or procedures that may be relevant, as well as an assessment demonstrating compliance with this Regulation .

The organisation may implement these alternative means of compliance subject to prior approval by the competent authority, and upon receipt of the notification as prescribed in M.B.104.

### **AMC1 M.A.620 Means of compliance**

#### DEMONSTRATION OF COMPLIANCE

In order to demonstrate that the Implementing Rules are met, a risk assessment should be completed and documented. The result of this risk assessment should demonstrate that an equivalent level of safety to that established by the Acceptable Means of Compliance (AMC) adopted by the Agency is reached.

**M.A.621 Management system record keeping**

- (a) The organisation shall establish a system of record keeping that allows adequate storage and reliable traceability of all management system processes as defined in M.A.616.
- (b) The format of the records shall be specified in the organisation's procedures.
- (c) Records shall be stored in a manner that ensures protection from damage, alteration, and theft.

**AMC1 M.A.621 Management system record keeping****GENERAL**

- (a) The record keeping system should ensure that all records are accessible whenever needed within a reasonable time. These records should be organised in a way that ensures traceability, and retrievability throughout the required retention period.
- (b) Records should be kept in paper form or in electronic format or a combination of both. Records stored on microfilm or optical disc format are also acceptable. The records should remain legible throughout the required retention period. The retention period starts when the record has been created or last amended.
- (c) Paper systems should use robust material which can withstand normal handling and filing. Computer systems should have at least one backup system which should be updated within 24 hours of any new entry. Computer systems should include safeguards against the ability of unauthorised personnel to alter the data.
- (d) All computer hardware used to ensure data backup should be stored in a different location from that containing the working data, and in an environment that ensures they remain in good condition. When hardware or software changes take place, special care should be taken that all necessary data continues to be accessible at least through the full period specified in the relevant Subpart. In the absence of such indication, all records should be kept for a minimum period of 5 years.

**GM1 M.A.621 Management system records****RECORDS**

Microfilming or optical storage of records may be carried out at any time. The records should be as legible as the original record, and remain so for the required retention period.

**M.A.622 Immediate reaction to a safety problem**

The organisation shall implement any safety measures mandated by the competent authority in accordance with M.B.106.

**SUBPART G — CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION****M.A.702 Application for an organisation certificate**

~~An application for issue or change of a continuing airworthiness management organisation approval shall be made on a form and in a manner established by the competent authority.~~

- (a) The application for an organisation certificate or an amendment to an existing certificate shall be made in a form and manner established by the competent authority, taking into account the applicable requirements of this Regulation.
- (b) Applicants for an initial certificate shall provide the competent authority with documentation demonstrating how they will comply with the requirements established in this Regulation. Such documentation shall include a procedure describing how changes not requiring prior approval will be managed and notified to the competent authority.

**AMC1 M.A.702 Application for an organisation certificate**

An application should be made on an EASA Form 2 (Appendix IX to AMC M.A.602 and AMC M.A.702) or equivalent acceptable to the competent authority.

The EASA Form 2 is valid for the application for M.A. Subpart F, Part-145 and M.A. Subpart G organisations. Organisations applying for several ~~certificates approvals~~ may do so by using a single EASA Form 2.

**AMC2 M.A.702 Application for an organisation certificate**

- (a) Draft documents should be submitted at the earliest opportunity so that investigation of the application can begin. Initial certification or approval of changes cannot be achieved until the competent authority is in possession of completed documents.
- (b) This information is required to enable the competent authority to conduct its investigation, to assess the volume of maintenance work necessary, and the locations at which it will be accomplished.
- (c) The organisation should inform the competent authority where base and scheduled line maintenance is to take place, and give details of any contracted maintenance which is in addition to that provided in response to M.A.201(h)(2) or M.A.708(c).

**M.A.703 Terms ~~Extent~~ of approval**

*Only the title has been changed.*

**M.A.704 Continuing airworthiness management exposition**

- (a) The continuing airworthiness management organisation shall provide a continuing airworthiness management exposition containing all the following information:
1. a statement signed by the accountable manager to confirm that the organisation will work in accordance with this Part and the exposition at all times, and;
  2. the organisation's safety policy as defined in M.A.712(a)(1);
  - 2.3. the organisation's scope of work, and;
  - 3.4. the title(s) and name(s) of person(s) referred to in points M.A.706(a), M.A.706(c), M.A.706(d) and M.A.706(i);
  - 4.5. an organisation chart showing associated chains of accountability and responsibility between all the person(s) referred to in points M.A.706(a), M.A.706(c), M.A.706(d) and M.A.706(i) and related to M.A.712(a)(1);
  - 5.6. a list of the airworthiness staff referred to in point M.A.707, specifying, where applicable, the staff authorised to issue permits to fly in accordance with point M.A.711(c);
  - 6.7. a general description and location of the facilities;
  - 7.8. procedures specifying how the continuing airworthiness management organisation ensures compliance with this Regulation Part and manages safety;
  - 8.9. the continuing airworthiness management exposition amendment procedures; and
  10. the documentation of management system key processes as required by M.A.712(a)(5)
  - 9.10 the list of approved aircraft maintenance programmes, or, for aircraft not involved in commercial air transport, the list of "generic" and "baseline" maintenance programmes.

- (b) ~~The continuing airworthiness management exposition and its amendments shall be approved by the competent authority.~~

The exposition shall be amended as necessary to remain an up-to-date description of the organisation. The exposition and any subsequent amendment shall be approved by the competent authority.

- (c) ~~Notwithstanding paragraph (b), minor amendments to the exposition may be approved indirectly through an indirect approval procedure. The indirect approval procedure shall define the minor amendment eligible, be established by the continuing airworthiness management organisation as part of the exposition and be approved by the competent authority responsible for that continuing airworthiness management organisation.~~

Notwithstanding paragraph (b) minor amendments to the exposition may not require prior approval and may be managed in accordance with the procedure referred to in M.A.702(b) approved in accordance with M.B.702(h).

**AMC1 M.A.704 Continuing airworthiness management exposition (see Appendices to Part M – Appendix V to AMC1 M.A.704)**

1.(a) The purpose of the continuing airworthiness management exposition is to set forth the procedures, means and methods of the M.A. Subpart G organisation. Compliance with its contents will assure compliance with Part-M requirements.

2.(b) A continuing airworthiness management exposition should comprise:

Part 0 General organisation

Part 1 Continuing airworthiness procedures

Part 2 Management system procedures ~~Quality system or organisational review (as applicable)~~

Part 3 Contracted maintenance (for operators) – management of maintenance (liaison with maintenance organisations in the case of operations other than non-commercial air transport)

Part 4 Airworthiness review procedures (if applicable)

Part 5 Supporting documents

3.(c) Where a M.A. Subpart G organisation is also approved to another Part, the exposition or manual required by the other Part may form the basis of the continuing airworthiness management exposition in a combined document. Example for a combined Part-145 and M.A. Subpart G organisation:

*Part-145 Exposition (see equivalent paragraphs in AMC 145.A.70(a))*

Part 1 General Management

Part 2 Maintenance procedures

Part L2 Additional line maintenance procedures

Part 3 Management Quality system procedures ~~or organisational review (as applicable)~~

Part 4 External parties

Part 5 Supporting documents ~~Appendices (sample of documents)~~

Part 7 FAA supplement (if applicable)

Part 8 TCCA supplement (if applicable)

Part 3 should also cover the functions specified by M.A.712 Management Quality system.

Part 4 should also cover contracted maintenance (for operators) – Management of maintenance (liaison with maintenance organisations in the case of non-commercial air transport)

Additional parts should be introduced covering the following (*see equivalent paragraphs in Appendix V to AMC M.A.704, which may have a different numbering system*):

Part 0 General organisation

Part 6 Continuing airworthiness management procedures

Part 9 Airworthiness review procedures (if applicable)

Example for a combined M.A. Subpart F and M.A. Subpart G organisation:

*M.A. Subpart F Maintenance Organisation Manual (see equivalent paragraphs in Appendix IV to AMC M.A.604, which have a different numbering system)*

Part 1 General

Part 2 Description

Part 3 General Procedures

Part 4 Working Procedures. ~~This Part contains, among other things, procedures for Organisational Reviews.~~

Part 5 Appendixes

Part 4 should also cover the functions and processes specified by M.A.712 Management Quality system ~~(or organisation review, as applicable).~~

Additional parts should be introduced covering the following **(see equivalent paragraphs in Appendix V to AMC M.A.704, which may have a different numbering system):**

Part 0 General organisation

Part 6 Continuing airworthiness management procedures

Part 7 Airworthiness review procedures (if applicable)

- 4.~~(d)~~ Personnel should be familiar with those parts of the exposition that are relevant to their tasks.
- 5.~~(e)~~ The M.A. Subpart G organisation should specify in the exposition **the person** who is responsible for the amendment of the document.
- 6.~~(f)~~ Unless otherwise agreed by the ~~approving~~ competent authority, the person responsible for the management of the quality system ~~or for the organisational review~~ should be responsible for monitoring and amending the exposition, including associated procedures manuals, and the submission of proposed amendments to the approving competent authority. ~~The approving competent authority may agree a procedure, which will be stated in the amendment control section of the exposition, defining the class of amendments which can be incorporated without the prior consent of the competent authority.~~
- 7.~~(g)~~ The operator may use electronic data processing (EDP) for the **distribution** ~~publication~~ of the continuing airworthiness management exposition. The continuing airworthiness management exposition should be made available to the ~~approving~~ competent authority in a form acceptable to the competent authority. Attention should be paid to the compatibility of EDP ~~publication~~ systems with the necessary dissemination of the continuing airworthiness management exposition, both internally and externally.
- 8.~~(h)~~ Part 0 "General organisation" of the continuing airworthiness management exposition should include a corporate commitment by the M.A Subpart G organisation, signed by the accountable manager confirming that the continuing airworthiness management exposition and any associated manuals define the organisation compliance with Part-M and will be complied with at all times.
- 9.~~(i)~~ The accountable manager's exposition statement should embrace the intent of the following paragraph, and in fact this statement may be used without amendment.

Any modification to the statement should not alter the intent:

This exposition defines the organisation and procedures upon which the competent authority\* M.A. Subpart G continuing airworthiness management approval is based.

These procedures are approved by the undersigned and should be complied with, as applicable, in order to ensure that all continuing airworthiness tasks of ... (quote operator's name) ... fleet of aircraft and/or of all aircraft under contract in accordance with M.A.201 (e) with ... (quote organisation's name) ... are carried out on time to an approved standard.

It is accepted that these procedures do not override the necessity of complying with any new or amended regulation published from time to time where these new or amended regulations are in conflict with these procedures.

It is understood that the competent authority\* will approve this organisation whilst the competent authority\* is satisfied that the procedures are being followed ~~and the work standard is maintained~~. It is understood that the competent authority\* reserves the right to suspend, ~~vary~~ **limit** or revoke the M.A. Subpart G continuing airworthiness management approval of the organisation or the air operators certificate, as applicable, if the competent authority\* has evidence that the procedures are not followed ~~and the standards not upheld~~.

Signed .....

Dated .....

Accountable Manager and ... (quote position) ...

For and on behalf of ... (quote organisation's name) ... '

\*Where it states competent authority, please insert the actual name of the approving competent authority organisation or administration delivering the M.A. Subpart G continuing airworthiness management approval or the air ~~operators~~ **operator** certificate."

~~10.(j)~~ Whenever the accountable manager is changed it is important to ensure that the new accountable manager signs the paragraph **(i)** 9 statement at the earliest opportunity as part of the acceptance by the ~~approving~~ competent authority.

~~Failure to carry out this action invalidates the M.A. Subpart G continuing airworthiness management approval or the air operators certificate.~~

~~11.(k)~~ The exposition should contain information as applicable, on how the continuing airworthiness management organisation complies with CDCCL instructions.

Appendix V contains an example of an exposition lay-out.

**M.A.706 Personnel requirements**

Point (j) is deleted and point (k), now included as (j), is amended as follows:

~~(j)~~ The organisation shall define and keep updated in the continuing airworthiness management exposition the title(s) and name(s) of person(s) referred to in points M.A.706(a), M.A.706(c), M.A.706(d) and M.A.706(i).

~~(k)~~ **(j)** For all **complex motor-powered** large-aircraft and for aircraft used for commercial air transport the organisation shall establish and control the competence of personnel involved in the continuing airworthiness management, airworthiness review and/or ~~quality~~ audits in accordance with a procedure and to a standard agreed by the competent authority. **In addition to the necessary expertise related to the job function,**

competence must include an understanding of the application of human factors and human performance issues appropriate to that person's function in the organisation.

### **AMC1 M.A.706(f) Personnel requirements**

#### **SUFFICIENT NUMBER OF STAFF**

- 1.(a) The person or group of persons should represent the continuing airworthiness management structure of the organisation and be responsible for all continuing airworthiness functions. Dependent on the size of the operation and the organisational set-up, the continuing airworthiness functions may be divided under individual managers or combined in nearly any number of ways. However, the compliance monitoring function if a quality system is in place it should be independent from the other functions.
- 2.(b) The actual number of persons to be employed and their necessary qualifications is dependent upon the tasks to be performed and thus dependent on the size and complexity of the organisation (general aviation aircraft, corporate aircraft, number of aircraft and the aircraft types, complexity of the aircraft and their age and for commercial air transport, route network, line or charter, ETOPS) and the amount and complexity of maintenance contracting. Consequently, the number of persons needed, and their qualifications may differ greatly from one organisation to another and a simple formula covering the whole range of possibilities is not feasible.
- 3.(c) To enable the approving competent authority to accept the number of persons and their qualifications, an organisation should make an analysis of the tasks to be performed, the way in which it intends to divide and/or combine these tasks, indicate how it intends to assign responsibilities and establish the number of man/hours and the qualifications needed to perform the tasks. With significant changes in the aspects relevant to the number and qualifications of persons needed, this analysis should be updated.

### **AMC1 M.A.706(g) Personnel requirements**

#### **KNOWLEDGE, BACKGROUND AND EXPERIENCE**

- 4.(a) Nominated person or group of persons should have:
  - 4.1.(1) practical experience and expertise in the application of aviation safety standards and safe operating practices;
  - 4.2.(2) a comprehensive knowledge of:
    - (a)(i) relevant parts of operational requirements and procedures;
    - (b)(ii) the AOC holder's Operations Specifications when applicable;
    - (c)(iii) the need for, and content of, the relevant parts of the AOC holder's Operations Manual when applicable;
  - 4.3.(3) knowledge of safety management systems and quality systems;
  - 4.4.(4) five years relevant work experience of which at least two years should be from the aeronautical industry in an appropriate position;
  - 4.5.(5) a relevant engineering degree or an aircraft maintenance technician qualification with additional education acceptable to the approving competent authority. 'relevant engineering degree' means an engineering degree from



aeronautical, mechanical, electrical, electronic, avionic or other studies relevant to the maintenance and continuing airworthiness of aircraft/aircraft components;

The above recommendation may be replaced by 5 years of experience additional to those already recommended by paragraph 4.4 (a)(4) above. These 5 years should cover an appropriate combination of experience in tasks related to aircraft maintenance and/or continuing airworthiness management (engineering) and/or surveillance of such tasks

4.6.(6) thorough knowledge with the organisation's continuing airworthiness management exposition;

4.7.(7) knowledge of a relevant sample of the type(s) of aircraft gained through a formalised training course. These courses should be at least at a level equivalent to Part-66 Appendix III Level 1 General Familiarisation and could be imparted by a Part-147 organisation, by the manufacturer, or by any other organisation accepted by the competent authority.

"Relevant sample" means that these courses should cover typical systems embodied in those aircraft being within the scope of approval.

For all balloons and any other aircraft of 2730 Kg MTOM and below the formalised training courses may be replaced by demonstration of knowledge. This knowledge may be demonstrated by documented evidence or by an assessment performed by the competent authority. This assessment should be recorded.

4.8.(8) knowledge of maintenance methods.

4.9.(9) knowledge of applicable regulations

#### **AMC1 M.A.706(k) (j) Personnel requirements**

(a) Adequate initial and recurrent training should be provided and recorded to ensure continued competence

(b) In respect to the understanding of the application of human factors and human performance issues, continuing airworthiness, management, and compliance monitoring personnel should be assessed for the need to receive initial human factors training, but, in any case, all continuing airworthiness, management, and compliance monitoring personnel should receive human factors continuation training. This should concern to a minimum:

- Post-holders, managers, supervisors;
- ARC staff;
- Technical support personnel such as, planners, engineers, and technical record staff;
- Compliance monitoring staff; and
- Contract staff in the above categories.

(c) Initial human factors training should cover all the topics of the training syllabus specified in GM1 145.A.30(e) either as a dedicated course or else integrated within other training, such as safety management training. The syllabus may be adjusted to reflect the particular nature of the organisation. The syllabus may also be adjusted to meet the particular nature of work for each function within the organisation. For example:

- small organisations may cover in less depth subjects related to teamwork and communication, and
- planners may cover in more depth the scheduling and planning objective of the syllabus.

Initial training should be provided to personnel within 6 months of joining the continuing airworthiness organisation, but temporary staff may need to be trained shortly after joining the organisation to cope with the duration of employment. Personnel being recruited from another organisation, and temporary staff should be assessed for the need to receive any additional human factors training

- (d) The purpose of human factors continuation training is primarily to ensure that staff remain current in terms of human factors, and also to collect feedback on human factors issues. Consideration should be given to the possibility that such training has the involvement of the safety manager, and compliance monitoring manager. There should be a procedure to ensure that feedback is formally passed from the trainers to the safety manager, and compliance monitoring manager to initiate action where necessary.

Human factors continuation training should be of an appropriate duration in each two-year period, in relation to relevant quality audit findings, and other internal/external sources of information available to the organisation on human errors in continuing airworthiness and maintenance.

- (e) Human factors training should be delivered by a competent trainer, and may be conducted by the organisation itself, or independent trainers, or any training organisations acceptable to the competent authority.
- (f) Training procedures, including those addressing human factors, should be specified in the continuing airworthiness organisation exposition.

### **GM1 M.A.706(c) Personnel requirements**

#### **RESPONSIBILITY FOR ENSURING COMPLIANCE**

'Person or group of persons' referred to in M.A.706(c) includes the compliance monitoring manager, as the compliance monitoring function itself is one of the elements to 'ensure' compliance with the applicable requirements.

This means that an EASA Form 4 should be provided for this person. It also means that the compliance monitoring function itself should be subject to monitoring of compliance in accordance with M.A.712(a)(6).

### **GM1 M.A.706(j) Personnel requirements**

#### **DEFINITIONS**

'Human factors' is anything that affects human performance, which means principles which apply to aeronautical design, certification, training, operations and maintenance, and which seek safe interface between the human and other system components by proper consideration of human performance.

'Human performance' means human capabilities and limitations which have an impact on the safety, and efficiency of aeronautical operations.

**GM2 M.A.706(j) Personnel requirements****HUMAN FACTORS TRAINER**

A competent Human Factors trainer should meet the following criteria:

- (a) attended training that is at least equivalent to the EASA Part 145 Maintenance Human Factors Initial training syllabus defined in GM 145.A.30(e);
- (b) received instruction in training techniques, and training development compatible with the skills to influence attitudes and behaviours;
- (c) has worked for a minimum of three years within the aviation industry, or possesses a suitable academic background; and
- (d) has an appropriate level of understanding of Human Factors in the maintenance environment in relation to the organisation's HF programme (module 10 of GM1 145.A.30(e)).

**M.A.708 Continuing airworthiness management**

- (a) All continuing airworthiness management shall be carried out according to the prescriptions of M.A Subpart C.
- (b) For every aircraft managed, the approved continuing airworthiness management organisation shall:
  - (1) develop and control a maintenance programme for the aircraft managed including any applicable reliability programme,
  - (2) present the aircraft maintenance programme and its amendments to the competent authority for approval, unless covered by an indirect approval procedure in accordance with point M.A.302(c), and provide a copy of the programme to the owner of aircraft not involved in commercial air transport,
  - (3) manage the approval of modification and repairs,
  - (4) ensure that all maintenance is carried out in accordance with the approved maintenance programme and released in accordance with M.A. Subpart H,
  - (5) ensure that all applicable airworthiness directives and operational directives with a continuing airworthiness impact, are applied,
  - (6) ensure that all defects discovered during scheduled maintenance or reported are corrected by an appropriately approved maintenance organisation,
  - (7) ensure that the aircraft is taken to an appropriately approved maintenance organisation whenever necessary,
  - (8) coordinate scheduled maintenance, the application of airworthiness directives, the replacement of service life limited parts, and component inspection to ensure the work is carried out properly,
  - (9) manage and archive all continuing airworthiness records and/or operator's technical log.
  - (10) ensure that the mass and balance statement reflects the current status of the aircraft.
- (c) In the case of commercial air transport, when the operator is not appropriately approved to Part-145, the operator shall establish a written maintenance contract between the operator and a Part-145 approved organisation or another operator, detailing the functions specified under M.A.301-2, M.A.301-3, M.A.301-5 and M.A.301-6, ensuring that all maintenance is ultimately carried out by a Part-145

approved maintenance organisation and defining the support of the ~~quality functions~~ compliance monitoring function of M.A.712~~(b)~~ (a)(6). The aircraft base, scheduled line maintenance and engine maintenance contracts, together with all amendments, shall be approved by the competent authority. However, in the case of:

- (1) an aircraft requiring unscheduled line maintenance, the contract may be in the form of individual work orders addressed to the Part-145 maintenance organisation.
  - (2) component maintenance, including engine maintenance, the contract as referred to in paragraph (c) may be in the form of individual work orders addressed to the Part-145 maintenance organisation.
- (d) The organisation shall ensure that human factors and human performance limitations are taken into account during continuing airworthiness management resulting in good maintenance practices.

**AMC1 M.A.708(c) Continuing airworthiness management (see Appendices to Part M - Appendix IX to AMC1 M.A.708(c))**

- 1.~~(a)~~ Where an operator is not approved under Part-145 or an operator's maintenance organisation is an independent organisation, a contract should be agreed between the operator and a maintenance organisation approved under Part-145, which specifies, in detail, the work to be performed by the maintenance organisation. Appendix XI to this AMC gives further details on the subject.
- 2.~~(b)~~ Both the specification of work and the assignment of responsibilities should be clear, unambiguous and sufficiently detailed to ensure that no misunderstanding should arise between the parties concerned (operator, maintenance organisation and the competent authority) that could result in a situation where work that has a bearing on the airworthiness or serviceability of aircraft is not or will not be properly performed.
- 3.~~(c)~~ Special attention should be paid to procedures and responsibilities to ensure that all maintenance work is performed, service bulletins are analysed and decisions taken on accomplishment, airworthiness directives are completed on time and that all work, including non-mandatory modifications is carried out to approved data and to the latest standards.
- 4.~~(d)~~ For line maintenance, the actual layout of the contract the IATA Standard Ground Handling Agreement may be used as a basis, but this does not preclude the competent authority of operator from ensuring that the content of the contract is acceptable to them, and especially that the contract allows the operator to properly exercise its maintenance responsibility. Those parts of a contract that have no bearing on the technical or operational aspects of airworthiness are outside the scope of this paragraph.
- 5.~~(e)~~ It is possible to contract another operator that is not directly approved under Part-145. In this case the operator's continuing airworthiness management exposition should include appropriate procedures to ensure that all this contracted maintenance is ultimately performed on time by organisations approved under Part-145 in accordance with the contracting operator's data. In particular the ~~quality system~~ compliance monitoring, and safety risk management procedures should place great emphasis on monitoring compliance with the above and ensuring proper hazard identification, and management of associated risks. The list of Part-145 approved contractors, or a reference to this list, should be included in the operator's continuing airworthiness management exposition.
- 6.~~(f)~~ Such a maintenance arrangement does not absolve the operator from its overall

continuing airworthiness responsibility. Specifically, in order to accept the maintenance arrangement, the competent authority should be satisfied that such an arrangement allows the operator to ensure full compliance with responsibilities pursuant to M.A.201.

- 7.(g) The purpose of M.A.708(c) is to ensure that all maintenance is carried out by properly approved Part-145 organisations. This does not preclude a primary maintenance arrangement with an operator that is not such an organisation, when it proves that such an arrangement is in the interest of the operator by simplifying the management of its maintenance, and the operator keeps an appropriate control of it. Such an arrangement should not preclude the operator from ensuring that all maintenance is performed by a Part-145 approved organisation and complying with the M.A.201 continuing airworthiness responsibility requirements. Typical examples of such arrangements follow:

Component maintenance:

The operator may find it more appropriate to have a primary contractor, that would despatch the components to appropriately approved organisations, rather than sending himself itself different types of components to various maintenance organisations approved under Part-145. The benefit for the operator is that the management of maintenance is simplified by having a single contact point for component maintenance. The operator remains responsible for ensuring that all maintenance is performed by maintenance organisations approved under Part-145 and in accordance with the approved standard.

Aircraft, engine and component maintenance:

The operator may wish to have a maintenance contract with another operator of the same type of aircraft not approved under Part-145. A typical case is that of a dry-leased aeroplane between operators where the parties, for consistency or continuity reasons (especially for short term lease agreements), find it appropriate to keep the aeroplane aircraft under the current maintenance arrangement. Where this arrangement involves various Part-145 approved contractors, it might be more manageable for the lessee operator to have a single contract with the lessor operator. Such an arrangement should not be understood as a transfer of responsibility to the lessor operator: the lessee operator, being the approved operator of the aircraft, remains responsible for the continuing airworthiness of the aircraft in performing the M.A.708 functions, and employing the M.A.706 continuing airworthiness management group of persons and staff.

In essence, this does not alter the intent of M.A.201 (h) in that it also requires that the operator has to establish a written maintenance contract acceptable to the competent authority of operator and, whatever type of acceptable arrangement is made, the operator is required to exercise the same level of control on contracted maintenance, particularly through the M.A.706 (c) continuing airworthiness management group of persons and management quality system as referred to in M.A.712.

## **AMC1 M.A.708(d) Continuing airworthiness management**

### **HUMAN FACTORS AND HUMAN PERFORMANCE LIMITATIONS**

- (a) Consideration of human factors and human performance limitations in the context of continuing airworthiness management should address, at least, the following:

- (1) identification of flight safety sensitive tasks;
- (2) development of the maintenance programme and recommendations for the maintenance planning, taking into account:
  - (i) human performance limitations;
  - (ii) the content of the work order or tasks, the risks of discovering findings that will delay the release to service, the slot available for the aircraft during maintenance in line with the operational dispatch of the aircraft without impairing the maintenance programme schedule; and
  - (iii) whether tasks should be carried out in line or base maintenance taking considerations of availability of workshops, limited human resources, time constraints, and environment;
- (3) producing maintenance documents according to a procedure, including the following, but not limited to:
  - (i) using a standard format and page layout for the job cards;
  - (ii) writing DANGER, WARNING and CAUTION statements using current international standards when appropriate;
  - (iii) avoiding use of acronyms and abbreviations;
  - (iv) using 'simplified English';
  - (v) verifying the documentation by having a second person check for technical accuracy;
  - (vi) validating the documentation by having a sample of users check for usability;
  - (vii) changing and updating the documentation; and
  - (viii) taking into account the aircraft configuration:
    - (A) using one action per statement; and
    - (B) ensuring the document delivery system is functional and well maintained.

### **GM1 M.A. 708(d) Continuing airworthiness management**

Reference document for simplified English:

ASD Simplified Technical English for Aerospace and Defence (ASD-STE100).

### **Appendix IX to AMC1 M.A.708(c) Continuing airworthiness management**

#### **CONTRACTED MAINTENANCE**

*Point 2.5 is amended as follows:*

#### **2.5. Quality monitoring Monitoring**

~~The terms of the contract should include a provision allowing the operator to perform a quality surveillance (including audits) upon the Part 145 approved organisation. The maintenance contract should specify how the results of the quality surveillance are taken into account by the Part 145 approved organisation (See also paragraph 2.22. 'Meetings').~~

The terms of the contract should include a provision allowing the operator to monitor the Part-145 organisation in terms of compliance with the applicable requirements and effectiveness of the organisation's safety risk management processes. The maintenance contract should specify how the results of such monitoring are taken into account by the Part-145 organisation (See also paragraph 2.22. 'Meetings').

For Part-145 approved organisations certified in accordance with industry management system standards, such as ISO 9001 or EN 9110, the terms of contract should specify if and how the operator intends to consider this certification for its own monitoring. Where relevant, this should in particular address the elements specified in 2.3 'Subcontracting', 2.22 'Exchange of information' and 2.23 'Meetings'.

**M.A.709 Documentation**

*Point (b) is amended as below:*

- (b) For aircraft not involved in commercial air transport, the approved continuing airworthiness management organisation may develop 'baseline' and/or 'generic' maintenance programmes in order to allow for the initial approval and/or the extension of the scope of an approval without having the contracts referred to in Appendix I to this Annex (Part M). These 'baseline' and/or 'generic' maintenance programmes, however, do not preclude the need to establish an adequate Aircraft Maintenance Programme in compliance with point M.A.302 in due time before exercising the privileges referred to in point M.A.711 (a)

**AMCGM1 M.A.709(a) Documentation****MAINTENANCE DATA PROVIDED BY THE CUSTOMER**

When using maintenance data provided by the customer, the continuing airworthiness management organisation is responsible for ensuring that this data is current. As a consequence, it should establish appropriate procedures or provisions in the contract with the customer.

The sentence '..., except when required by point M.A.714', means, in particular, the need to keep a copy of the customer data which was used to perform continuing airworthiness activities during the contract period.

**GM1 M.A.709(b) Documentation****BASELINE OR GENERIC MAINTENANCE PROGRAMME**

'Baseline' maintenance programme: it is a maintenance programme developed for a particular aircraft type following, where applicable, the maintenance review board (MRB) report, the type certificate holder's maintenance planning document (MPD), the relevant chapters of the maintenance manual or any other maintenance data containing information on scheduling.

'Generic' maintenance programme: it is a maintenance programme developed to cover a group of similar types of aircraft. These programmes should be based on the same type of instructions as the baseline maintenance programme. Examples of 'generic' maintenance programmes could be Cessna 100 Series (covering Cessna 150, 172, 177, etc.).

'Baseline' and 'generic' maintenance programmes are not applicable to a particular aircraft registration mark, but to an aircraft type or group of types, and should be available to the competent authority prior to the initial approval and prior to the extension of the scope of an existing organisation approval. The intent is that the competent authority is aware of the scope and complexity of tasks that will be managed before granting an organisation approval or change of approval.

After this initial approval, when an owner/operator is contracted, the baseline or generic maintenance programme, as applicable, may be used to establish the M.A.302 aircraft maintenance programme, incorporating the additional maintenance tasks and indicating those which are not applicable to a particular aircraft registration mark. This may be achieved by adding an Annex to the baseline/generic maintenance programme for each aircraft registration, specifying which tasks are added and which are not applicable. This will result in an aircraft maintenance programme specific for each customer.

However, this does not mean that this adaptation must be performed for each contracted aircraft registration. The reason is that the customer may already have an approved aircraft



maintenance programme, which in that case should be used by the continuing airworthiness management organisation to manage the continuing airworthiness of such aircraft.

Continuing airworthiness management organisations may seek authorisation for ~~indirect~~ approval in order to amend the aircraft maintenance programme mentioned above in accordance with M.A.302(c). The ~~indirect~~ approval procedure should include provisions to notify to the competent authority that an aircraft maintenance programme specific for a customer has been created. The reason is that, according to M.A.704(a)(9), for aircraft not involved in commercial air transport the Continuing Airworthiness Management Exposition (CAME) only needs to include the reference to the baseline/generic maintenance programme.

### **M.A.711 Privileges of the organisation**

- (a) A continuing airworthiness management organisation approved in accordance with Section A, Subpart G of this Annex (Part M) may:
1. manage the continuing airworthiness of aircraft, except those involved in commercial air transport, as listed on the approval certificate.
  2. manage the continuing airworthiness of commercial air transport aircraft when listed both on its approval certificate and on its Air Operator Certificate (AOC);
  3. arrange to carry out limited continuing airworthiness tasks with any contracted organisation, working under its **management** ~~quality~~ system, as listed on the approval certificate;
  4. extend, under the conditions of point M.A.901(f), an airworthiness review certificate that has been issued by the competent authority or by another continuing airworthiness management organisation approved in accordance with Section A, Subpart G of this Annex (Part M).
- (b) An approved continuing airworthiness management organisation registered in one of the Member States may, additionally, be approved to carry out airworthiness reviews referred to in point M.A.710 and:
1. issue the related airworthiness review certificate and extend it in due time under the conditions of points M.A.901(c)2 or M.A.901(e)2; and,
  2. issue a recommendation for the airworthiness review to the competent authority of the Member State of registry.
- (c) A continuing airworthiness management organisation whose approval includes the privileges referred to in point M.A.711(b) may additionally be approved to issue a permit to fly in accordance with Part 21A.711(d) of the Annex (Part-21) to Regulation ~~(EC) No 1702/2003~~ (EU) No 748/2012 for the particular aircraft for which the organisation is approved to issue the airworthiness review certificate, when the continuing airworthiness management organisation is attesting conformity with approved flight conditions, subject to an adequate approved procedure in the exposition referred to in point M.A.704.

### **AMC GM1 M.A.711(b) Privileges of the organisation**

- (a) An organisation may be approved for the privileges of M.A.711(a) only, without the privilege to carry out airworthiness reviews. This can be contracted to another appropriately approved organisation. In such a case, it is not mandatory that the contracted organisation is linked to an AOC holder, being possible to contract an appropriately approved independent continuing airworthiness management organisation which is approved for the same aircraft type

- (b) In order to be approved for the privileges of M.A.711(b) for a particular aircraft type, it is necessary to be approved for the privileges of M.A.711(a) for that aircraft type. As a consequence, the normal situation in this case is that the organisation will be performing continuing airworthiness management tasks and performing airworthiness reviews on every aircraft type contained in the approval certificate.
- (c) Nevertheless, this does not necessarily mean that the organisation needs to be currently managing an aircraft type in order to be able to perform airworthiness reviews on that aircraft type. The organisation may be performing only airworthiness reviews on an aircraft type without having any customer under contract for that type.
- (d) Furthermore, this situation should not necessarily lead to the removal of the aircraft type from the organisation approval. As a matter of fact, since in most cases the airworthiness review staff are not involved in continuing airworthiness management activities, it cannot be argued that these airworthiness review staff are going to lose their skills just because the organisation is not managing a particular aircraft type. The important issue in relation to maintaining a particular aircraft type in the organisation approval is whether the organisation continuously fulfils all the Subpart G requirements (facilities, documentation, qualified personnel, management quality system, etc.) required for initial approval.

#### **M.A.712 Management Quality system**

- ~~(a) To ensure that the approved continuing airworthiness management organisation continues to meet the requirements of this Subpart, it shall establish a quality system and designate a quality manager to monitor compliance with, and the adequacy of, procedures required to ensure airworthy aircraft. Compliance monitoring shall include a feedback system to the accountable manager to ensure corrective action as necessary.~~
- ~~(b) The quality system shall monitor M.A. Subpart G activities. It shall at least include the following functions:
 
  - ~~1. monitoring that all M.A. Subpart G activities are being performed in accordance with the approved procedures, and;~~
  - ~~2. monitoring that all contracted maintenance is carried out in accordance with the contract, and;~~
  - ~~3. monitoring the continued compliance with the requirements of this Part.~~~~
- ~~(c) The records of these activities shall be stored for at least two years.~~
- (a) The organisation shall establish, implement, and maintain a management system that includes:
  - (1) clearly defined lines of responsibility and accountability throughout the organisation, including a direct safety accountability of the accountable manager;
  - (2) a description of the overall philosophies and principles of the organisation with regard to safety, referred to as the safety policy;
  - (3) the identification of aviation safety hazards entailed by the activities of the organisation, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness;
  - (4) maintaining personnel trained and competent to perform their safety management related duties and tasks;
  - (5) documentation of all management system key processes, including a process for

making personnel aware of their responsibilities and the procedure for amending this documentation;

- (6) a function to monitor compliance of the organisation with the relevant requirements. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary; and
  - (7) any additional requirements that are prescribed in this Regulation
- (b) The management system shall correspond to the size of the organisation and the nature and complexity of its activities, taking into account the hazards and associated risks inherent in these activities.
- (c)(d) ~~Where the approved continuing airworthiness management organisation is approved in accordance with another Part, the quality system may be combined with that required by the other Part.~~

Where the organisation holds one or more additional organisation certificates within the scope of Regulation (EC) 216/2008, the management system may be combined or integrated with that required under the additional certificate (s) held.

- (d)(e) In case of commercial air transport the M.A. Subpart G ~~quality management~~ system shall be an integrated part of the operator's ~~quality management~~ system.
- ~~(f) In the case of a small organisation not managing the continuing airworthiness of aircraft used in commercial air transport, the quality system may be replaced by regular organisational reviews subject to the approval of the competent authority, except when the organisation issues airworthiness review certificates for aircraft above 2730 kg MTOM other than balloons. In the case where there is no quality system, the organisation shall not contract continuing airworthiness management tasks to other parties.~~
- (e) Notwithstanding point (a)(6), a small organisation not managing the continuing airworthiness of aircraft used in commercial air transport, and not issuing airworthiness review certificates for aircraft above 2 730 kg MTOM other than balloons, may replace the compliance monitoring function by regular organisational reviews subject to the approval of the competent authority. In the case where there is no compliance monitoring function, the organisation shall not contract continuing airworthiness management tasks to other parties.

## **AMC1 M.A.712(a)(1);(2);(3);(5) Management system**

### **NON-COMPLEX ORGANISATIONS – GENERAL**

- (a) Safety risk management may be performed using hazard checklists, or similar risk management tools, or processes which are integrated into the activities of the organisation.
- (b) The organisation should manage safety risks related to a change. The management of change should be a documented process to identify external and internal change that may have an adverse effect on safety. It should make use of the organisation's existing hazard identification, risk assessment, and mitigation processes.
- (c) The organisation should identify a person who fulfils the role of safety manager and who is responsible for coordinating the safety management system. This person may be the accountable manager, or a person with an operational role in the organisation.
- (d) Within the organisation, responsibilities should be identified for hazard identification, risk assessment and mitigation.

- (e) The safety policy should include a commitment to improve towards the highest safety standards, comply with all applicable legal requirements, meet all applicable standards, consider best practices, and provide appropriate resources.
- (f) The organisation should, in cooperation with other stakeholders, develop, coordinate, and maintain an emergency response plan (ERP) that ensures orderly and safe transition from normal to emergency operations, and return to normal operations. The ERP should provide the actions to be taken by the organisation, or specified individuals in an emergency, and reflect the size, nature and complexity of the activities performed by the organisation.

### **AMC1 M.A.712(a)(1) Management system**

#### **COMPLEX ORGANISATIONS — ORGANISATION AND ACCOUNTABILITIES**

- (a) The management system should encompass safety by including a safety manager, and a safety review board in the organisational structure.
- (b) The functions of the safety manager should be to:
  - (1) facilitate hazard identification, risk analysis and management;
  - (2) monitor the implementation of actions taken to mitigate risks, as listed in the safety action plan;
  - (3) provide periodic reports on safety performance;
  - (4) ensure maintenance of safety management documentation;
  - (5) ensure that there is safety management training available, and that it meets acceptable standards;
  - (6) provide advice on safety matters; and
  - (7) ensure initiation and follow-up of internal occurrence/accident investigations.
- (c) Safety review board
  - (1) The Safety review board should be a high level committee that considers matters of strategic safety in support of the accountable manager's safety accountability.
  - (2) The board should be chaired by the accountable manager, and be composed of the persons nominated in accordance with M.A.706(c) and (d).
  - (3) The safety review board should monitor:
    - (i) safety performance against the safety policy and objectives;
    - (ii) that any safety action is taken in a timely manner; and
    - (iii) the effectiveness of the organisation's safety management processes.
- (d) The safety review board should ensure that appropriate resources are allocated to achieve the established safety performance, eventually by recommending the establishment of one or more safety action groups.
- (e) The safety manager or any other relevant person may attend, as appropriate, safety review board meetings. He/she may communicate to the accountable manager all information, as necessary, to allow decision making based on safety data.

**GM1 M.A.712(a)(1) Management system****SAFETY MANAGER**

- (a) Depending on the size of the organisation and the nature and complexity of its activities, the safety manager may be assisted by additional safety personnel for the performance of all allocated safety management tasks as defined in AMC1 M.A.712(a)(1) point 2.
- (b) Regardless of the organisational set-up, it is important that the safety manager remains the unique focal point as regards the development, administration, and maintenance of the organisation's management system as related to safety.

**GM2 M.A.712(a)(1) Management system****COMPLEX ORGANISATIONS - SAFETY ACTION GROUP**

- (a) A safety action group may be established as a standing group or as an ad hoc group to assist, or act on behalf of the safety manager or safety review board.
- (b) More than one safety action group may be established depending on the scope of the task, and specific expertise required.
- (c) The safety action group should report to, and take strategic direction from the safety review board, and should be comprised of managers, and continuing airworthiness management personnel.
- (d) The safety action group may be tasked with:
  - (1) monitoring safety performance;
  - (2) resolving identified risks;
  - (3) assessing the impact on safety of organisational changes; and
  - (4) ensuring that safety actions are implemented within agreed timescales.
- (e) The safety action group may also be tasked with the review the effectiveness of previous safety actions and safety promotion.

**AMC1 M.A.712(a)(2) Management system****SAFETY POLICY**

- (a) The safety policy should:
  - (1) be endorsed by the accountable manager;
  - (2) reflect organisational commitments regarding safety, and its proactive and systematic management;
  - (3) be communicated, with visible endorsement, throughout the organisation;
  - (4) include internal reporting principles, and encourage personnel to report maintenance related errors, incidents and hazards; and
  - (5) recognise the need for all personnel to cooperate for compliance monitoring and safety investigations.
- (b) The safety policy should include a commitment:
  - (1) to improve towards the highest safety standards;

- (2) to comply with all applicable legislation, meet all applicable standards, and consider best practices;
- (3) to provide appropriate resources;
- (4) to apply human factors principles;
- (5) to enforce safety as one primary responsibility of all managers; and
- (6) to ensure that personnel are not inappropriately punished for reporting or cooperating with occurrence investigations.

(c) Management should:

- (1) continually promote the safety policy to all personnel, and demonstrate their commitment to it;
- (2) provide necessary human and financial resources for its implementation; and
- (3) establish safety objectives and performance standards.

### **GM1 M.A.712(a)(2) Management system**

#### **SAFETY POLICY**

The safety policy is the means whereby the organisation states its intention to maintain and, where practicable, improve safety levels in all its activities and to minimise its contribution to the risk of an aircraft accident or serious incident as far as it is reasonably practicable.

It reflects the management's commitment to safety and should reflect the organisations philosophy of safety management and become the foundation on which the organisation's management system is built. It serves as a reminder as to 'how we do business here'. The creation of a positive safety culture begins with the issuance of a clear, unequivocal direction.

The safety policy should state that the purpose of internal safety reporting, and internal safety investigations is to improve safety, not to apportion blame to individuals.

### **AMC1 M.A.712(a)(3) Management system**

#### **COMPLEX ORGANISATIONS — SAFETY MANAGEMENT KEY PROCESSES**

##### **(a) Hazard identification processes**

- (1) Reactive and proactive schemes for hazard identification should be used as the formal means of collecting, recording, analysing, acting on, and generating feedback about hazards, and the associated risks that may affect safety.
- (2) All reporting systems, including confidential reporting schemes, should include an effective feedback process.
- (3) The organisation should in particular focus on:
  - (i) hazards that may be generated from the limitations in human performance; and
  - (ii) hazards that may stem from the existence of complex, multi-tier, subcontract maintenance and operational arrangements.

(b) Risk management processes

- (1) A formal safety risk management process should be developed and maintained that ensures analysis (in terms of likelihood, and severity of hazards and occurrence), assessment (in terms of tolerability), and control (in terms of mitigation) of risks to an acceptable level.
- (2) The levels of management who have the authority to make decisions regarding the tolerability of safety risks, in accordance with (2)(a), should be specified.

(c) Internal occurrence investigation

The scope of internal occurrence investigations should extend beyond the scope of the external occurrence reporting in accordance with M.A.202.

(d) Safety performance monitoring and measurement

- (1) Safety performance monitoring and measurement should be the process by which the organisation's safety performance is verified in comparison to its safety policy and objectives.
- (2) This process may include, as appropriate to the size, nature and complexity of the organisation:
  - (i) safety reporting, addressing also the status of compliance with the applicable requirements;
  - (ii) safety reviews including trends reviews which would be conducted during introduction and deployment of new equipment/technologies, implementation of new or changed procedures, or in situations of organisational changes that may have an impact on safety;
  - (iii) audits focussing on the integrity of the organisation's management system, and periodically assessing the status of safety risk controls; and
  - (iv) safety surveys, examining particular elements or procedures of a specific area, such as problem areas identified, or bottlenecks in daily maintenance activities, perceptions and opinions of maintenance personnel, and areas of dissent or confusion.

(e) The management of change

The organisation should manage safety risks related to a change. The management of change should be a documented process to identify external and internal change that may have an adverse effect on safety. It should make use of the organisation's existing hazard identification, risk assessment and mitigation processes.

(f) Continual improvement

The organisation should continually seek to improve its safety performance. Continual improvement should be achieved through:

- (1) proactive and reactive evaluations of facilities, equipment, documentation, and procedures through safety audits and surveys;
- (2) proactive evaluation of individuals' performance to verify the fulfilment of their safety responsibilities;
- (3) reactive evaluations in order to verify the effectiveness of the system for control and mitigation of risk; and
- (4) an annual review of the safety performance and the effectiveness of the management system.

**(g) Emergency response planning**

- (1) An Emergency Response Plan (ERP) should be established that provides the actions to be taken by the organisation, or specified individuals in an emergency. The ERP should reflect the size, nature, and complexity of the organisation's scope of work.
- (2) The ERP should ensure:
  - (i) planned and coordinated action to ensure the risks attributable to a major safety event can be managed and minimised;
  - (ii) an orderly and safe transition from normal to emergency operations;
  - (iii) safe continuation of operations or return to normal operations as soon as practicable; and
  - (iv) coordination with the emergency response plans of other organisations, where appropriate.

**AMC2 M.A.712(a)(3) Management system****SAFETY RISK MANAGEMENT**

- (a) Safety risk management processes should specifically address the planned implementation of, or participation in any complex multi-tier contracting/subcontracting arrangements between an operator, one or more continuing airworthiness management organisations and different maintenance organisations.
- (b) Hazard identification and risk assessment should start with an identification of all parties involved in the arrangement, including consultants and non-approved organisations. It should extend to the overall control structure, assessing in particular the following elements across all subcontract levels and all parties within such arrangements:
  - (1) coordination and interfaces between the different parties;
  - (2) applicable procedures;
  - (3) communication between all parties involved, including reporting and feedback channels;
  - (4) task allocation and responsibilities; and
  - (5) qualifications and competency of key personnel.
- (c) Safety risk management should focus on the following aspects:
  - (1) clear assignment of accountability and allocation of responsibilities;
  - (2) only one party is responsible for a specific aspect of the arrangement – no overlapping or conflicting responsibilities, in order to eliminate coordination errors;
  - (3) existence of clear and un-bureaucratic reporting lines, both for occurrence reporting and progress reporting;
  - (4) possibility for front-line staff in any of the parties to directly notify the operator of any safety significant issue.
- (d) Regular communication between all parties to discuss work progress, risk mitigation actions, changes to the arrangement, as well as any other significant issues should be ensured.



**GM1 M.A.712(a)(3) Management system**

## SAFETY RISK MANAGEMENT

- (a) In very broad terms, the objective of safety risk management is to eliminate risk where practical, or reduce the risk (likelihood/severity) to acceptable levels, and to manage the remaining risk so as to avoid, or mitigate any possible undesirable outcome. It is, therefore, integral to the development and application of effective safety management.
- (b) Safety risk management can be applied at many levels in an organisation. It can be applied at the strategic level and operational levels. The potential for human error its influences and sources should be identified and managed through the safety risk management process. HF risk management should allow the organisation to determine where it is vulnerable to human performance limitations.
- (c) Further guidance on how to implement safety risk management processes can be found in GM3 145.A.65(a)(3).

**GM2 M.A.712(a)(3) Management system**

## SAFETY RISK MANAGEMENT

- (a) Whereas the external occurrence reporting scheme to be implemented in accordance with M.A.202 may provide for reactive hazard identification, the internal safety reporting scheme to be established in accordance with M.A.721 may provide both for reactive and proactive hazard identification.
- (b) Other elements of proactive hazard identification may be:
  - (1) regular assessment of the organisation's existing management system and processes, including through internal and external audits;
  - (2) an assessment of any changes that may affect the organisation's management system and processes, before these become effective.

**GM3 M.A.712(a)(3) Management system**

## MANAGEMENT OF CHANGE

- (a) Unless properly managed, changes in organisational structure, facilities, scope of work, personnel, documentation, policies and procedures, etc. can result in the inadvertent introduction of new hazards, exposing the organisation to new, or increased risk. Effective organisations seek to improve processes, with a conscious recognition that changes can expose the organisation to potentially latent hazards and risks if not properly and effectively managed.
- (b) Regardless of the magnitude of change, large or small, there must always be a proactive consideration for safety implications. This is primarily the responsibility of the team proposing and/or implementing the change. However, change can only be successful if all personnel affected by the change are engaged, involved, and participate in the process. The magnitude of change, its safety criticality, and its potential impact on human performance should be assessed in any change management process.
- (c) Management of change provides principles and a structured framework for managing all aspects of the change. Disciplined application of change management can

maximise the effectiveness of the change, engage staff, and minimise the risks inherent in change.

- (d) Change is the catalyst for the organisation to performing the hazard identification, and risk management process.

Some examples of change include, but are not limited to:

- (1) organisational structure;
  - (2) new aircraft type included in the approval;
  - (3) additional aircraft of the same or similar type.
  - (4) significant changes in personnel (affecting key personnel and/or large numbers of personnel, high turn-over);
  - (5) new or amended regulations;
  - (6) competition;
  - (7) customer base;
  - (8) security;
  - (9) financial status;
  - (10) new schedule(s), location(s), equipment, and/or operational procedures; and
  - (11) new subcontractors
- (e) The organisation should also identify the changes likely to occur in its business which would have a noticeable impact on:
- (1) resources — material and human;
  - (2) management direction — processes, procedures, training; and
  - (3) management control.
- (f) The change also has the potential to introduce new, or exacerbate pre-existing HF issues. For example, changes in computer systems, equipment, technology, procedures, work organisation, or work processes are likely to affect performance.
- (g) The purpose of integrating HF into the management of change is to minimise potential risks by specifically considering the impact of the change on the people within a system.
- (h) Special consideration, including any HF issues, should be given to the 'transition period'. In addition, the activities utilised to manage these issues should be integrated into the change management plan.
- (i) The organisation should demonstrate that:
- (1) It has established a process, and conducts formal hazard analyses/risk assessment for major operational changes, major organisational changes, changes in key personnel, and changes that may affect the way maintenance is carried out.
  - (2) Safety case/risk assessments are aviation safety focused.
  - (3) Key stakeholders are involved in the change management process as appropriate.
  - (4) During the change management process, previous risk assessments, and existing hazards are reviewed for possible effect.
  - (5) For larger, more complex organisations:

- (i) A validation of the safety performance is carried out after organisational changes to assure assumptions remain valid and the change was effective.
- (ii) All organisational changes are subject to the change management process.
- (iii) Safety accountabilities, authorities and responsibilities are reviewed as part of any change.

#### **GM4 M.A.712(a)(3) Management system**

##### EMERGENCY RESPONSE PLAN (ERP)

- (a) The organisation's ERP needs to reflect the size of the organisation, and nature and complexity of its activities. An ERP typically defines the procedures, roles, responsibilities, and actions of key personnel and third parties that may be affected by an emergency, considering all activities of the organisation which may affect safety of flight, and all locations for such activities.
- (b) The organisation should have a process to distribute the ERP procedures, and to communicate the content to all affected personnel, and third parties if required. In an emergency, key personnel need to have easy access to the ERP at all times.
- (c) The ERP should be periodically tested for the adequacy of the plan, and the results reviewed to improve its effectiveness.

#### **AMC1 M.A.712(a)(4) Management system**

##### TRAINING AND COMMUNICATION ON SAFETY

###### (a) Training

- (1) All personnel should receive safety training as appropriate for their safety responsibilities.
- (2) Adequate records of all safety training provided should be kept.

###### (b) Communication

- (1) The organisation should establish communication about safety matters that:
  - (i) ensures that all personnel are aware of the safety management activities, as appropriate, for their safety responsibilities;
  - (ii) conveys safety critical information, especially relating to assessed risks and analysed hazards;
  - (iii) explains why particular actions are taken; and
  - (iv) explains why safety procedures are introduced or changed.
- (2) Regular meetings with personnel where information, actions, and procedures are discussed, may be used to communicate safety matters.

**GM1 M.A.712(a)(4) Management system****TRAINING AND COMMUNICATION ON SAFETY**

The safety training programme may consist of self-instruction via a media (newsletters, flight safety magazines), classroom training, e-learning, or similar training provided by training service providers.

**AMC1 M.A.712 (a)(5) Management Quality-system****PROCEDURES**

1. (a) Procedures should be held current such that they reflect best practice within the organisation. It is the responsibility of all employees to report any difficulties with the procedures via their organisation's internal safety reporting mechanisms scheme.
2. (b) All procedures, and changes to the procedures, should be verified and validated before use where practicable.
3. The feedback part of the system should address who is required to rectify any non-compliance in each particular case and the procedure to be followed if rectification is not completed within appropriate timescales. The procedure should lead to the accountable manager specified in M.A.706.
4. The independent quality audit reports referenced in AMC M.A.712 (b) should be sent to the relevant department for rectification action giving target rectification dates. Rectification dates should be discussed with such department before the quality department or nominated quality auditor confirms such dates in the report. The relevant department is required to rectify findings and inform the quality manager or the quality auditor of such rectification.
5. The accountable manager should hold regular meetings with staff to check progress on rectification except that in the large organisations such meetings may be delegated on a day to day basis to the quality manager subject to the accountable manager meeting at least twice per year with the senior staff involved to review the overall performance and receiving at least a half yearly summary report on findings of non-compliance.

**GM1 M.A.712 (a)(5) Management system****MANAGEMENT SYSTEM DOCUMENTATION**

- (a) The organisation may document all management system key processes in a separate Safety Management Manual (SMM) or in its CAME. Organisations approved in accordance with other Parts may prefer a separate SMM in order to avoid duplication. The safety management manual (SMM) or CAME, depending on the case, should be the key instrument for communicating the approach to safety management for the whole of the organisation. The organisation should document all aspects of safety management, including the safety policy, objectives, procedures, and individual safety responsibilities.
- (b) The organisation may also choose to document some of the information required to be documented in separate documents (e.g. procedures). In this case, it should ensure that manuals contain adequate references to any document kept separately. Any such documents are then to be considered an integral part of the organisation's management system documentation.

**AMC1 M.A.712 (b) (a)(6) Management Quality System****COMPLIANCE MONITORING GENERAL**

- 1- (a) The primary objectives of the compliance monitoring function ~~quality system~~ are to enable the M.A. Subpart G organisation to ensure airworthy aircraft and to remain in compliance with the Part-M requirements.
- 2- (b) An essential element of the compliance monitoring function ~~quality system~~ is the independent audit.
- 3- (c) The independent audit ~~should be~~ is an objective process of routine sample checks of all aspects of the M.A. Subpart G organisation's ability to carry out continuing airworthiness management to the required standards. It ~~should~~ includes some product sampling as this is the end result of the process.
- 4- (d) The independent audit ~~should~~ represents an objective overview of the complete continuing airworthiness management related activities. It is intended to complement the M.A.902 requirement for an airworthiness review to be satisfied that all aircraft managed by the organisation remain airworthy.
- (e) An organisation should establish an audit plan to show when and how often the activities as required by M.A. Subpart G will be audited.
- 5- (f) The independent audit should ensure that all aspects of M.A. Subpart G compliance are checked every 12 months ~~annually~~, including all the subcontracted activities, and may be carried out as a complete single exercise or subdivided over the 12-month audit planning cycle ~~annual period~~ in accordance with a scheduled plan. The independent audit does not require each procedure to be checked against each product line when it can be shown that the particular procedure is common to more than one product line and the procedure has been checked ~~every year~~ every 12 months without resultant findings. Where findings have been identified, the particular procedure should be rechecked against other product lines until the findings have been rectified after which the independent audit procedure may revert back to the ~~annual 12-month planning cycle interval~~ for the particular procedure. Provided that there are no safety related findings, the audit ~~planning cycle time periods~~ specified in this AMC may be increased by up to 100% subject to an appropriate risk assessment and agreement by the competent authority.
- 6- (g) Where the organisation has more than one location approved the compliance monitoring function ~~quality system~~ should describe how these are integrated into the system and include a plan to audit each location every 12 months or on a risk based programme as agreed by the competent authority ~~year~~.
- 7- (h) A report should be raised each time an audit is carried out describing what was checked and the resulting findings against applicable requirements and procedures ~~and products~~.
- (i) The feedback part of the system should address who is required to rectify any non-compliance in each particular case, and the procedure to be followed if rectification is not completed within appropriate timescales. The procedure should lead to the accountable manager specified in M.A.706.
- (j) The independent audit reports should be sent to the relevant department for corrective action giving target dates. Target dates should be discussed with such department before the compliance monitoring function confirms such dates in the report. The relevant department is required to correct non-compliances and inform the compliance monitoring function of such correction.
- (k) The accountable manager should hold regular meetings with staff to check progress on corrective actions. In the large organisations such meetings may be delegated on a day-to-day basis to the compliance monitoring manager subject to:

- (1) the accountable manager meeting at least twice per year with the senior staff involved to review the overall performance; and
  - (2) receiving at least a half yearly summary report on findings of non-compliance.
- 8- (I) The independence of the audit should be established by always ensuring that audits are carried out by personnel not responsible for the function, procedure or products being checked.
9. ~~An organisation should establish a quality plan acceptable to the competent authority of approval to show when and how often the activities as required by M.A. Subpart G will be audited.~~

### **GM1 M.A.712(a)(6) Management system**

#### TERMINOLOGY

1. 'Audit' means a systematic, independent, and documented process for obtaining evidence, and evaluating it objectively to determine the extent to which requirements are complied with.
2. 'Inspection' means an independent documented conformity evaluation by observation and judgement accompanied, as appropriate, by measurement, testing or gauging, in order to verify compliance with applicable requirements.

### **AMC1 M.A.712 (b) Management system**

#### SIZE, NATURE AND COMPLEXITY OF THE ACTIVITY

- (a) An organisation should be considered as non-complex when:
- (1) it has no more than 10 full-time equivalents (FTEs) actively engaged in continuing airworthiness management; and
  - (2) it is not involved in the management of continuing airworthiness of complex motor-powered aircraft, or aircraft used in commercial air transport.
- (b) Where the organisation holds approvals pursuant to any other Part, this should be taken into consideration to determine whether it is complex or non-complex.
- (c) Notwithstanding point (a), organisations only involved in the management of continuing airworthiness of balloons or sailplanes should be considered non-complex by default.

### **GM1 M.A.712(b) Management system**

'Not involved in the management of continuing airworthiness of complex motor-powered aircraft, or aircraft used in commercial air transport' means the organisation has not been directly contracted by an owner/operator to perform the continuing airworthiness management of such aircraft, and that it is not working as a subcontractor for another continuing airworthiness management organisation that has been directly contracted by an owner/operator to perform such tasks.

**AMC1 M.A.712 (f) (e) Management Quality system**

~~A small organisation is considered to be an~~ For organisations with no more than up to 5 full-time equivalents (FTEs) staff (including all M.A.706 personnel) ~~or equivalent proportional number when using part-time staff~~ the compliance monitoring system can be replaced by an organisational review. The ~~complexity of the organisation,~~ combination of aircraft and aircraft types, the utilisation of the aircraft and the number of approved locations of the organisations should also be considered before replacing the quality system by an organisational review.

Appendix XIII should be used to manage the organisational reviews.

The following activities should not be considered as subcontracting and, as a consequence, they may be performed without a ~~compliance monitoring function~~ Quality System, although they need to be described in the continuing airworthiness management exposition and be approved by the competent authority:

- Subscription to a technical publisher that provides maintenance data (Aircraft Maintenance Manuals, Illustrated Parts Catalogues, Service Bulletins, etc.), which may be applicable to a wide range of aircraft. These data may include maintenance schedules recommended by different manufacturers that can be afterwards used by the continuing airworthiness management organisation in order to produce customised maintenance programmes.
- Contracting the use of a software tool for the management of continuing airworthiness data and records, under the following conditions (in addition to M.A.714(d) and (e)):
  - If the tool is used by several organisations, each organisation should have access to its own data only.
  - Introduction of data can only be performed by personnel of the continuing airworthiness management organisation.
  - The data can be retrieved at any time.

**Appendix XIII to AMC1 M.A.712(e) (f)**

**Organisational reviews may replace the compliance monitoring function a full quality system in accordance with the provisions of M.A.712 (e) (f) and AMC M.A.712 (e) (f) and as described in the continuing airworthiness management exposition (CAME)**

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

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

- a. Identification of the person responsible for the organisational review programme:  
By default, this person should be the accountable manager, unless he/she delegates this responsibility to (one of) the M.A.706(c) person(s).
- b. Identification and qualification criteria for the person(s) responsible for performing the organisational reviews:  
These persons should have a thorough knowledge of the regulations and of the continuing airworthiness management organisation (CAMO) procedures. They should also have knowledge of audits, acquired through training or through experience (preferably as an auditor, but also possibly because they actively participated in several audits conducted by the competent authority).
- c. Elaboration of the organisational review programme:
  - Checklist(s) covering all items necessary to be satisfied that the organisation delivers a safe product and complies with the applicable requirements regulation. All procedures described in the CAME should be addressed.
  - A schedule for the accomplishment of the checklist items. Each item should be checked at least every 12 months. The organisation may choose to conduct one full review annually or to conduct several partial reviews.
- d. Performance of organisational reviews:  
Each checklist item should be answered using an appropriate combination of:
  - review of records, documentation, etc.
  - sample check of aircraft under contract.
  - interview of personnel involved.
  - review of discrepancies and internal safety difficulty internal reports (e.g.: notified difficulties in using current procedures and tools, systematic deviations from procedures, etc.).
  - review of complaints filed by customers.
- e. Management of findings and occurrence reports:



- All findings should be recorded and notified to the affected persons.
- All level 1 findings, in the sense of M.A.716(a) M.B.705, should be immediately notified to the competent authority and all necessary actions on aircraft in service should be immediately taken.
- All occurrence reports, internal and external, should be reviewed with the aim for continuous improvement of the management system by identifying possible corrective and preventive actions. This should be done in order to find pre-existing conditions prior indicators (e.g., notified difficulties in using current procedures and tools, systematic deviations from procedures, unsafe behaviours, etc.), and dismissed alerts that, had they been recognised and appropriately managed before the event, could have resulted in the undesired event being prevented.
- Corrective and preventive actions should be approved by the person responsible for the organisational review programme and implemented within a specified time frame.
- Once the person responsible for the organisational review programme is satisfied that the corrective action is effective, closure of the finding should be recorded along with a summary of the corrective action.
- The accountable manager should be notified of all significant findings and, on a regular basis, of the global results of the organisational review programme.

Following is a typical example of a simplified organisational review checklist, **to be adapted as necessary to cover the CAME procedures:**

### 1 – Scope of work

- All aircraft under contract are covered in the EASA Form 14.
- The scope of work in the CAME does not disagree with differ from the EASA Form 14.
- No work has been performed outside the scope of the EASA Form 14 and the CAME.
- ~~Is it justified to retain in the approved scope of work aircraft types for which the organisation has no longer aircraft under contract?~~

### 2 – Airworthiness situation of the fleet

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

### 3 – Aircraft maintenance programme

- Check that all revisions to the TC/STC holders' Instructions for Continuing Airworthiness, since the last review, have been (or are planned to be) incorporated in the maintenance programme, unless otherwise approved by the

Competent Authority have been considered to determine the need to incorporate them into the maintenance programme.

- Has the maintenance programme been revised to take into account all modifications or repairs impacting the maintenance programme?
- Have all maintenance programme amendments been approved at the right level (competent authority or indirect approval)?
- Does the status of compliance with the maintenance programme reflect the latest approved maintenance programme?
- Has the use of maintenance programme deviations and tolerances been properly managed and approved?

#### **4 – Airworthiness Directives (and other mandatory measures issued by the competent authority)**

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

#### **5 – Modifications/repairs**

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

#### **6 – Relations with the owners/operators**

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

## 7 – Personnel

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

## 8 – Maintenance contracted

- Sample check of maintenance records:
  - Existence and adequacy of the work order,
  - Data received from the maintenance organisation:
    - Valid CRS including any deferred maintenance,
    - List of removed and installed equipment and copy of the associated **EASA** Form 1 or equivalent.
- Obtain a copy of the current approval certificate(s) (**EASA** Form(s) 3) of the maintenance organisation(s) contracted.

## 9 – Technical records and record keeping

- Have the certificates (**EASA** Form 1 and Conformity certificates) been properly collected and recorded?
- Perform a sample check of technical records to ensure completeness and storage during the appropriate periods.
- Is storage of computerised data properly ensured?

## 10 – Occurrence reporting procedures

- Check that **internal and external** reporting is properly performed,

- Check that actions have been taken and recorded, as appropriate,
- Check that results from internal reporting are duly considered for the purpose of safety training.

## **11 – Airworthiness review**

## **12 – Safety management**

- Check that there is a hazard log and risk register, or equivalent document, and that they are up to date,
- Check the management system is being reviewed by the Accountable Manager and Safety Manager for its effectiveness,
- Check that any organisational changes have been documented, and appropriate hazard and risk assessments have been carried out,
- Check that there is an ERP in place, and it is up to date,
- Check that any risk mitigations or preventive actions are being applied and are effective.

**M.A.713 Changes to the approved continuing airworthiness organisation**

In order to enable the competent authority to determine continued compliance with this Part, the approved continuing airworthiness management organisation shall notify it of any proposal to carry out any of the following changes, before such changes take place:

1. the name of the organisation.
2. the location of the organisation.
3. additional locations of the organisation.
4. the accountable manager.
5. any of the persons specified in M.A.706(c).
6. the facilities, procedures, work scope and staff that could affect the approval.

In the case of proposed changes in personnel not known to the management beforehand, these changes shall be notified at the earliest opportunity.

(a) Any change affecting:

- (1) the scope of the certificate or the terms of approval of the organisation, or
- (2) any of the elements of the organisation's management system as required in M.A.712(a)(1) and (a)(2),

shall require prior approval by the competent authority.

(b) For any changes requiring prior approval in accordance with (a), the organisation shall apply for, and obtain an approval issued by the competent authority. The application shall be submitted before any such change takes place, in order to enable the competent authority to determine continued compliance with this Regulation, and to amend, if necessary, the organisation certificate and related terms of approval attached to it.

The organisation shall provide the competent authority with any relevant documentation.

The change shall only be implemented upon receipt of formal approval by the competent authority in accordance with M.B.706.

The organisation shall operate under the conditions prescribed by the competent authority during such changes, as applicable.

(c) All changes not requiring prior approval shall be managed and notified to the competent authority as defined in the procedure referred to in M.A.702(b) and approved by the competent authority in accordance with M.B.702(h).

**AMC1 M.A.713 Changes to the organisation****APPLICATION TIME FRAMES**

(a) The application for the amendment of an organisation certificate should be submitted at least 30 days before the date of the intended changes.

(b) In the case of a planned change of a nominated person, the organisation should inform the competent authority at least 10 days before the date of the proposed change.

(c) Unforeseen changes should be notified at the earliest opportunity, in order to enable the competent authority to determine continued compliance with the applicable requirements, and to amend, if necessary, the organisation certificate and related terms of approval.

**GM1 M.A.713(a) Changes to the organisation****GENERAL**

- (a) Typical examples of changes that may affect the certificate, or the terms of approval are listed below:
- (1) the name of the organisation;
  - (2) the organisation's principal place of business;
  - (3) the organisation's scope of approval;
  - (4) additional locations of the organisation;
  - (5) the accountable manager;
  - (6) any of the persons referred to in M.A.706(c);
  - (7) the organisation's documentation as required by this Regulation, safety policy and procedures; and
  - (8) the facilities, equipment, tools, material, procedures, work scope, or airworthiness review staff.
- (b) Prior approval by the competent authority is required for any changes to the organisation's procedure describing how changes not requiring prior approval will be managed, and notified to the competent authority.
- (c) Changes requiring prior approval may only be implemented upon receipt of formal approval by the competent authority.

**GM2 M.A.713(a) Changes to the organisation****CHANGE OF NAME OF THE ORGANISATION**

A change of name requires the organisation to submit a new application as a matter of urgency.

Where this is the only change to report, the new application can be accompanied by a copy of the documentation previously submitted to the competent authority under the previous name, as a means of demonstrating how the organisation complies with the applicable requirements.

**~~AMC-GM3 M.A.713~~ Changes to the ~~approved continuing airworthiness~~ organisation**

1. This paragraph covers scheduled changes to the ~~continuing airworthiness organisation's approval~~. Whilst the requirements relating to air operator certificates, including their issue, variation and continued validity, are prescribed in Annex III (Part-ORO) to Commission Regulation (EC) No 965/2012 ~~the appropriate regulation~~, operators should be aware this paragraph is included in Part-M and may affect continued acceptance of the continuing airworthiness management.
2. The primary purpose of this paragraph is to enable the ~~continuing airworthiness organisation~~ to remain approved if agreed by the competent authority during negotiations about any of the specified changes. Without this paragraph the approval would automatically be suspended in all cases.

**M.A.714 Continuing airworthiness management record Record-keeping**

*No change except for the title*

**M.A.715 Continued validity of approval**

- (a) ~~An approval shall be issued for an unlimited duration. It shall remain valid~~ The organisation's certificate shall remain valid subject to:
1. the organisation remaining in compliance with Annex I (this Part-M), taking into account in accordance with the provisions related to the handling of findings as specified under M.B.705 and;
  2. the competent authority being granted access to the organisation to determine continued compliance with this Regulation this Part, and;
  3. the approval certificate not being surrendered or revoked.
- (b) Upon revocation or surrender ~~surrender or revocation~~, the approval certificate shall be returned to the competent authority without delay.

**M.A.716 Findings**

- (a) ~~A level 1 finding is any significant non-compliance with Part M requirements which lowers the safety standard and hazards seriously the flight safety.~~
- (b) ~~A level 2 finding is any non-compliance with the Part M requirements which could lower the safety standard and possibly hazard the flight safety.~~
- (c) ~~After receipt of notification of findings according to M.B.705, the holder of the continuing airworthiness management organisation approval shall define a corrective action plan and demonstrate corrective action to the satisfaction of the competent authority within a period agreed with this authority.~~

After receipt of notification of findings according to M.B.705 the organisation shall:

- (a) identify the root cause of the non-compliance;
- (b) define a corrective action plan; and
- (c) demonstrate corrective action implementation to the satisfaction of the competent authority within a period agreed with that authority as defined in M.B.705.

**AMC1 M.A.716 Findings****GENERAL**

The corrective action plan defined by the organisation should address the effects of the non-compliance, as well as its root cause.

**GM1 M.A.716 Findings****GENERAL**

- (a) Preventive action is the action to eliminate the cause of a potential non-compliance, or other undesirable potential situation.
- (b) Corrective action is the action to eliminate or mitigate the root cause(s) and prevent recurrence of an existing detected non-compliance, or other undesirable condition or

situation. Proper determination of the root cause is crucial for defining effective corrective actions to prevent reoccurrence.

- (c) Correction is the action to eliminate a detected non-compliance.

## **GM2 M.A.716 Findings**

### **ROOT-CAUSE ANALYSIS**

- (a) It is important that the analysis does not primarily focus on establishing who or what caused the non-compliance but why it was caused. Establishing the root-cause or causes of a non-compliance often requires an overarching view of the events and circumstances that lead to it, to identify all possible systemic and contributing factors (regulatory, human factors, organisational, managerial, cultural, technical, etc.) in addition to the direct factors. A narrow focus on single events or failures, or the use of a simple, linear model, such as fault tree, to identify the chain of events that lead to the non-compliance may not properly reflect the complexity of the issue, and, therefore bears the risk that important factors required to be addressed in order to prevent reoccurrence will be ignored.
- (b) Such inappropriate or partial root-cause analysis often leads to defining 'quick fixes' addressing the symptoms of the nonconformity only. A peer review of the results of the root-cause analysis may increase its reliability and objectivity.
- (c) A system description of the organisation considering organisational structures, processes and their interfaces, procedures, staff, equipment, facilities and the environment in which the organisation operates will support both effective root-cause (reactive) and hazard (proactive) analysis.

## **M.A.717 Management system record keeping**

- (a) The organisation shall establish a system of record keeping that allows adequate storage and reliable traceability of all management system processes as defined in M.A.712.
- (b) The format of the records shall be specified in the organisation's procedures.
- (c) Records shall be stored in a manner that ensures protection from damage, alteration, and theft.

## **AMC1 M.A.717 Management system record keeping**

### **GENERAL**

- (a) The record keeping system should ensure that all records are accessible whenever needed within a reasonable time. These records should be organised in a way that ensures traceability and retrievability throughout the required retention period.
- (b) Records should be kept in paper form or in electronic format or a combination of both. Records stored on microfilm or optical disc format are also acceptable. The records should remain legible throughout the required retention period. The retention period starts when the record has been created or last amended.



- (c) Paper systems should use robust material which can withstand normal handling and filing. Computer systems should have at least one backup system which should be updated within 24 hours of any new entry. Computer systems should include safeguards against the ability of unauthorised personnel to alter the data.
- (d) All computer hardware used to ensure data backup should be stored in a different location from that containing the working data and in an environment that ensures they remain in good condition. When hardware or software changes take place, special care should be taken that all necessary data continues to be accessible at least through the full period specified in the relevant provision. In the absence of such indication, all records should be kept for a minimum period of 5 years.

### **GM1 M.A.717 Management system records**

#### **RECORDS**

Microfilming or optical storage of records may be carried out at any time. The records should be as legible as the original record, and remain so for the required retention period.

### **M.A.720 Means of compliance**

- (a) Alternative means of compliance to the AMC adopted by the Agency may be used by an organisation to establish compliance with this Regulation.
- (b) When an organisation wishes to use an alternative means of compliance, it shall, prior to implementing it, provide the competent authority with a full description of the alternative means of compliance. The description shall include any revisions to manuals or procedures that may be relevant, as well as an assessment demonstrating compliance with this Regulation.

The organisation may implement these alternative means of compliance subject to prior approval by the competent authority, and upon receipt of the notification as prescribed in M.B.104.

### **AMC1 M.A.720 Means of compliance**

#### **DEMONSTRATION OF COMPLIANCE**

In order to demonstrate that the Implementing Rules are met, a risk assessment should be completed and documented. The result of this risk assessment should demonstrate that an equivalent level of safety to that established by the Acceptable Means of Compliance (AMC) adopted by the Agency is reached.

### **M.A.721 Internal safety reporting scheme**

- (a) As part of its management system, the organisation shall establish an internal safety reporting scheme, as detailed in the exposition, to enable the collection and evaluation of such occurrences to be reported under M.A.202.
- (b) The scheme shall also enable the collection and evaluation of those errors, near-misses, and hazards reported internally that do not fall under point (a) above.

Through this scheme, the organisation shall:

- (1) identify and address the factors contributing to occurrences in order to reduce the likelihood of reoccurrence;
  - (2) identify adverse trends, corrective actions taken, or to be taken by the organisation to address deficiencies; and
  - (3) ensure evaluation of all known relevant information relating to errors, near-misses, and hazards, and a method to circulate the information as necessary.
- (c) For all complex motor-powered aircraft and for aircraft used for commercial air transport, the organisation shall cooperate on occurrence investigations with the relevant maintenance organisation(s).

### **AMC1 M.A.721 Internal safety reporting scheme**

- (a) The internal safety reporting scheme should be confidential and enable and encourage free and frank reporting of any potentially safety related occurrence, including incidents such as errors or near-misses, safety issues and hazards identified. This will be facilitated by the establishment of a just culture. An organisation should ensure that personnel are not inappropriately punished for reporting or cooperating with occurrence investigations.
- The internal safety reporting scheme should contain the following elements:
- (1) clearly identified aims and objectives with demonstrable corporate commitment;
  - (2) a just culture policy and process identified and published;
  - (3) an investigation process to:
    - i. identify those reports which require further investigation; and
    - ii. establish all root causes, including any technical, organisational, managerial, or human factors issues, and any other contributing factors relating to the event;
  - (4) appropriate corrective actions based on investigation findings;
  - (5) for complex organisations:
    - i. investigators selected and trained on a recurrent basis; and
    - ii. analysis of the collective data showing contributing factor trends and frequencies; and
  - (6) where relevant, the operator and the organisation should cooperate on occurrence investigations by exchanging relevant information for improved aviation safety.
- (b) The internal safety reporting scheme should:
- (1) assure confidentiality to the reporter;
  - (2) be closed-loop, to ensure that actions are taken internally to address any safety issues and hazards; and
  - (3) feed into the continuation training as defined in the AMC to M.A.706(k), whilst maintaining appropriate confidentiality.
- (c) Feedback should be given to reportees both on an individual and a more general basis to ensure their continued support of the safety reporting scheme.

**GM1 M.A.721 Internal safety reporting scheme****DEFINITIONS**

1. Near-miss: An occurrence which under slightly different circumstances could have led to an aircraft incident or accident.
2. Error: Non-intentional action or inaction by a person that may lead to deviations from accepted procedures or regulations.

Errors are often associated with occasions where a planned sequence of mental or physical activities either fails to achieve its intended outcome, or is not appropriate with regard to the intended outcome, and when results cannot be attributed to the intervention of some chance agency.

3. Hazard: A condition that could cause or contribute to an aircraft incident or accident.

Hazards can be related to human performance, the environment, organisational factors (commercial pressure, resource constraints, and culture) or technical factors (design of aircraft, systems, tooling, and equipment).

4. Safety Culture: An enduring set of values, norms, attitudes, and practices within an organisation concerned with minimising exposure of the workforce and the general public to dangerous or hazardous conditions. In a positive safety culture, a shared concern for, commitment to, and accountability for safety is promoted.
5. Just Culture: A culture in which front line operators or others are not punished for actions, omissions or decisions taken by them that are commensurate with their experience and training, but where gross negligence, wilful violations and destructive acts are not tolerated.

**M.A.722 Immediate reaction to a safety problem**

The organisation shall implement:

- (a) any safety measures mandated by the competent authority in accordance with M.B.106; and
- (b) any relevant mandatory safety information issued by the Agency.

## Section B

# Procedures for Competent Authorities

### SUBPART A — GENERAL

#### **M.B.102 Competent authority**

(a) General

The A Member State shall designate a competent authority with allocated responsibilities for the issuance, continuation, change, suspension or revocation of certificates and for the oversight of continuing airworthiness. This competent authority shall establish documented procedures and an organisational structure.

(b) Resources

The number of staff shall be appropriate to carry out the requirements as detailed in this Section B.

(c) Qualification and training

All staff involved in Part M activities shall be appropriately qualified and have appropriate knowledge, experience, initial training and continuation training to perform their allocated tasks.

(d) Procedures

The competent authority shall establish procedures detailing how compliance with this Part is accomplished.

The procedures shall be reviewed and amended to ensure continued compliance.

#### **M.B.103 Oversight documentation**

The competent authority shall provide all legislative acts, standards, rules, technical publications, and related documents to relevant personnel in order to allow them to perform their tasks and to discharge their responsibilities.

#### **M.B.104 Means of compliance**

(a) The Agency shall develop Acceptable Means of Compliance (AMC) that may be used to establish compliance with Regulation (EC) No 216/2008 and its Implementing Rules. When the AMC are complied with, the related requirements of the Implementing Rules are met.

(b) Alternative means of compliance may be used to establish compliance with the Implementing Rules.

(c) The competent authority shall establish a system to consistently evaluate that all alternative means of compliance used by itself or by organisations and persons under its oversight allow the establishment of compliance with Regulation (EC) No 216/2008 and its Implementing Rules.

- (d) The competent authority shall evaluate all alternative means of compliance proposed by a person in accordance with M.A.203, or an organisation in accordance with M.A.620, or M.A.720 by analysing the documentation provided and, if considered necessary, conducting an inspection of the organisation.

When the competent authority finds that the alternative means of compliance are in accordance with the Implementing Rules, it shall without undue delay:

- (1) notify the applicant that the alternative means of compliance may be implemented and, if applicable, amend the approval or certificate of the applicant accordingly; and
  - (2) notify the Agency of their content, including copies of all relevant documentation.
  - (3) inform other Member States about alternative means of compliance that were accepted.
- (e) When the competent authority itself uses alternative means of compliance to achieve compliance with Regulation (EC) No 216/2008 and its Implementing Rules it shall:
- (1) make them available to all organisations and persons under its oversight; and
  - (2) without undue delay notify the Agency.

The competent authority shall provide the Agency with a full description of the alternative means of compliance, including any revisions to procedures that may be relevant, as well as an assessment demonstrating that the Implementing Rules are met.

#### **AMC1 M.B.104(d)(3) Means of compliance**

The information to be provided to other Member States following approval of an alternative means of compliance should contain a reference to the Acceptable Means of Compliance (AMC) to which such means of compliance provides an alternative, as well as a reference to the corresponding Implementing Rule, indicating, as applicable, the subparagraph(s) covered by the alternative means of compliance.

#### **GM1 M.B.104 Means of compliance**

Alternative means of compliance used by a competent authority, or by a person or organisations under its oversight may be used by other competent authorities, persons, or organisations only if processed again in accordance with M.B.104(d) and (e).

#### **M.B.105 Information to the Agency**

- (a) The competent authority shall without undue delay notify the Agency in case of any significant problems with the implementation of Regulation (EC) No 216/2008 and its Implementing Rules.
- (b) The competent authority shall provide the Agency with safety-significant information stemming from the occurrence reports it has received pursuant to M.A.202.

**M.B.106 Immediate reaction to a safety problem**

- (a) Without prejudice to Directive 2003/42/EC of the European Parliament and of the Council<sup>3</sup> the competent authority shall implement a system to appropriately collect, analyse, and disseminate safety information.
- (b) The Agency shall implement a system to appropriately analyse any relevant safety information received, and without undue delay provide to Member States and the Commission any information, including recommendations or corrective actions to be taken, necessary for them to react in a timely manner to a safety problem involving products, parts, appliances, persons or organisations subject to Regulation (EC) No 216/2008 and its Implementing Rules.
- (c) Upon receiving the information referred to in (a) and (b), the competent authority shall take adequate measures to address the safety problem.
- (d) Measures taken under (c) shall immediately be notified to all persons or organisations which need to comply with them under Regulation (EC) No 216/2008 and its Implementing Rules. The competent authority shall also notify those measures to the Agency and, when combined action is required, the other Member States concerned.

**M.B.110 Management system**

- (a) The competent authority shall establish and maintain a management system, including as a minimum:
  - (1) documented policies and procedures to describe its organisation, means and methods to achieve compliance with Regulation (EC) No 216/2008 and its Implementing Rules. The procedures shall be kept up to date, and serve as the basic working documents within that competent authority for all related tasks;
  - (2) a sufficient number of personnel to perform its tasks and discharge its responsibilities. A system shall be in place to plan the availability of personnel, in order to ensure the proper completion of all tasks;
  - (3) personnel qualified to perform their allocated tasks and have the necessary knowledge, experience, initial and recurrent training to ensure continuing competence.
  - (4) adequate facilities and office accommodation to perform the allocated tasks;
  - (5) a function to monitor compliance of the management system with the relevant requirements and adequacy of the procedures including the establishment of an internal audit process and a safety risk management process. Compliance monitoring shall include a feedback system of audit findings to the senior management of the competent authority to ensure implementation of corrective actions as necessary; and
  - (6) a person or group of persons, ultimately responsible to the senior management of the competent authority for the compliance monitoring function.
- (b) The competent authority shall, for each field of activity, including management system, appoint one or more persons with the overall responsibility for the management of the relevant task(s).

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<sup>3</sup> OJ L 167, 4.7.2003, p. 23.

- (c) The competent authority shall establish procedures for participation in a mutual exchange of all necessary information and assistance with other competent authorities concerned, including all findings raised and follow-up actions taken as a result of oversight of persons and organisations exercising activities in the territory of a Member State, but certified by the competent authority of another Member State or the Agency.
- (d) A copy of the procedures related to the management system and their amendments shall be made available to the Agency for the purpose of standardisation.

### **AMC M.B.110 M.B.102 (a) Management system ~~Competent authority~~**

#### GENERAL

1. In deciding upon the required airworthiness organisational structure, the competent authority should review:
  - (a) the number of certificates to be issued, the number and size of potential operators, the number of M.A. Subpart F approved maintenance organisations and M.A. Subpart G continuing airworthiness management organisations within that Member State.
  - (b) the possible use of qualified entities and of resources of other Member State competent authorities to fulfil the continuing oversight obligations.
  - (c) as well as the level of civil aviation activity, number and complexity of aircraft and the size and complexity of the Member State's aviation industry.
  - (d) the potential growth of activities in the field of civil aviation.
2. The competent authority should retain effective control of important inspection functions and not delegate them in such a way that aircraft owners, operators, M.A. Subpart F approved maintenance organisations and M.A. Subpart G continuing airworthiness management organisations, in effect, regulate themselves in airworthiness matters.
3. The set-up of the organisational structure should ensure that the various tasks and obligations of the competent authority do not solely ~~are not~~ relying on individuals. ~~That means that a~~ A continuous continuing and undisturbed fulfilment of these tasks and obligations of the competent authority should also be guaranteed in case of illness, accident or leave of individual employees.

### **GM1 M.B.110 Management system**

- (a) The competent authority designated by each Member State should be organised in such a way that:
  - (1) there is specific and effective management authority in the conduct of all relevant activities;
  - (2) the functions and processes described in the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, and AMC, Certification Specifications (CSs), and Guidance Material (GM) may be properly implemented;
  - (3) the competent authority's organisation and operating procedures for the implementation of the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules are properly documented and applied;

- (4) all competent authority personnel involved in the related activities are provided with training where necessary;
  - (5) specific and effective provision is made for the communication and interface as necessary with the Agency and the competent authorities of other Member States; and
  - (6) all functions related to implementing the applicable requirements are adequately described.
- (b) A general policy in respect of activities related to the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules should be developed, promoted, and implemented by the manager at the highest appropriate level; for example, the manager at the top of the functional area of the competent authority that is responsible for such activities.
  - (c) Appropriate steps should be taken to ensure that the policy is known and understood by all personnel involved, and all necessary steps should be taken to implement and maintain the policy.
  - (d) The general policy, whilst also satisfying additional national regulatory responsibilities, should in particular take into account:
    - (1) the provisions of Regulation (EC) No 216/2008;
    - (2) the provisions of the applicable Implementing Rules and their AMC, CSs, and GM;
    - (3) the needs of industry; and
    - (4) the needs of the Agency and of the competent authority.
  - (e) The policy should define specific objectives for key elements of the organisation and processes for implementing related activities, including the corresponding control procedures and the measurement of the achieved standard.

### **AMC1 M.B.110(a)(1) Management system**

#### **DOCUMENTED POLICIES AND PROCEDURES**

- (a) The various elements of the organisation involved with the activities related to Regulation (EC) No 216/2008 and its Implementing Rules should be documented in order to establish a reference source for the establishment and maintenance of this organisation.
- (b) The documented procedures should be established in a way that facilitates their use. They should be clearly identified, kept up to date, and made readily available to all personnel involved in the related activities.
- (c) The documented procedures should cover, as a minimum, all of the following aspects:
  - (1) policy and objectives;
  - (2) organisational structure;
  - (3) responsibilities and associated authority;
  - (4) procedures and processes;
  - (5) internal and external interfaces;
  - (6) internal control procedures;



- (7) training of personnel;
  - (8) cross references to associated documents; and
  - (9) assistance from other competent authorities or the Agency (where required).
- (d) It is likely that the information is held in more than one document or series of documents, and suitable cross-referencing should be provided. For example, organisational structure and job descriptions are not usually in the same documentation as the detailed working procedures. In such cases, it is recommended that the documented procedures include an index of cross references to all such other related information, and the related documentation should be readily available when required.

### **GM1 M.B.110(a)(2) Management system**

#### **SUFFICIENT PERSONNEL**

- (a) This GM on the determination of the required personnel is limited to the performance of certification and oversight tasks, excluding personnel required to perform tasks subject to any national regulatory requirements.
- (b) The elements to be considered when determining required personnel and planning their availability may be divided into quantitative and qualitative elements:
- (1) Quantitative elements:
    - (i) the estimated number of initial certificates to be issued;
    - (ii) the number of organisations certified by the competent authority; and
    - (iii) the number of line stations within the territory of the Member States of organisations established in another Member State.
  - (2) Qualitative elements:
    - (i) the size, nature, and complexity of activities of certified organisations, taking into account:
      - (A) privileges of the organisation;
      - (B) type of approval, scope of approval;
      - (C) possible certification to industry standards;
      - (D) number of personnel; and
      - (E) organisational structure, existence of subsidiaries;
    - (ii) the safety priorities identified;
    - (iii) the results of past oversight activities, including audits, inspections and reviews, in terms of risks and regulatory compliance, taking into account:
      - (A) number and level of findings;
      - (B) timeframe for implementation of corrective actions; and
      - (C) maturity of management systems implemented by organisations, and their ability to effectively manage safety risks; and

- (iv) the size and complexity of the Member State's aviation industry, and the potential growth of activities in the field of civil aviation which may be an indication of the number of new applications, and changes to existing certificates to be expected.
- (c) Based on existing data from previous oversight planning cycles, and taking into account the situation within the Member State's aviation industry, the competent authority may estimate:
- (1) the standard working time required for processing applications for new certificates;
  - (2) the number of new certificates to be issued for each planning period; and
  - (3) the number of changes to existing certificates to be processed for each planning period.
- (d) In line with the competent authority's oversight policy, the following planning data should be determined:
- (1) standard number of audits to be performed per oversight planning cycle;
  - (2) standard duration of each audit;
  - (3) standard working time for audit preparation, on-site audit, reporting, and follow-up, per inspector;
  - (4) standard number of unannounced inspections to be performed;
  - (5) standard duration of inspections, including preparation, reporting, and follow-up, per inspector; and
  - (6) minimum number and required qualification of inspectors for each audit/inspection.
- (e) Standard working time could be expressed either in working hours per inspector, or in working days per inspector. All planning calculations should, then, be based on the same unit (hours or working days).
- (f) It is recommended to use a spreadsheet application to process data defined under (c) and (d), to assist in determining the total number of working hours/days per oversight planning cycle required for certification, oversight and enforcement activities. This application could also serve as a basis for implementing a system for planning the availability of personnel.
- (g) The number of working hours/days per planning period for each qualified inspector that may be allocated for certification, oversight and enforcement activities should be determined, taking into account:
- (1) purely administrative tasks not directly related to certification and oversight;
  - (2) training;
  - (3) participation in other projects;
  - (4) planned absence; and
  - (5) the need to include a reserve for unplanned tasks or unforeseeable events.
- (h) The determination of working time available for certification, oversight and enforcement activities should also consider:
- (1) the possible use of qualified entities;

- (2) possible cooperation with other competent authorities for approvals involving more than one Member State; and
  - (3) oversight activities under a bilateral aviation safety agreement.
- (i) Based on the elements listed above, the competent authority should be able to:
- (1) monitor dates when audits and inspections are due, and when they have been carried out;
  - (2) implement a system to plan the availability of personnel; and
  - (3) identify possible gaps between the number and qualification of personnel and the required volume of certification and oversight.

Care should be taken to keep planning data up to date in line with changes in the underlying planning assumptions, with particular focus on risk-based oversight principles.

### **AMC1 M.B.110(a)(3) Management system**

#### QUALIFICATION AND TRAINING — GENERAL

- (a) The competent authority should ensure appropriate and adequate training of its personnel to meet the standard that is considered necessary to perform the work. To ensure personnel remain qualified, arrangements should be made for initial and recurrent training as required.
- (b) The basic capability of the competent authority's personnel is a matter of recruitment, and normal management functions in selection of personnel for particular duties. Moreover, the competent authority should provide training in the basic skills as required for those duties. However, to avoid differences in understanding and interpretation, all personnel should be provided with further training specifically related to Regulation (EC) No 216/2008, its Implementing Rules and related AMC, CSs, and GM, as well as related to the assessment of alternative means of compliance.
- (c) The competent authority may provide training through its own training organisation with qualified trainers, or through another qualified training source.
- (d) When training is not provided through an internal training organisation, adequately experienced and qualified persons may act as trainers, provided their training skills have been assessed. If required, an individual training plan should be established covering specific training skills. Records should be kept of such training, and of the assessment, as appropriate.

### **AMC2 M.B. 110(a)(3) ~~102(e)~~ Management system Competent authority**

#### QUALIFICATION AND TRAINING — INSPECTORS

1. Competent authority inspectors should have:
  - 1.1 practical experience and expertise in the application of aviation safety standards and safe operating practices;
  - 1.2 comprehensive knowledge of:
    - (a) relevant parts of ~~i~~Implementing ~~r~~Rules, ~~e~~Certification ~~s~~Specifications and ~~g~~Guidance ~~m~~Material;
    - (b) the competent authority's procedures;

- (c) the rights and obligations of an inspector;
  - (d) safety and quality management systems;
  - (e) continuing airworthiness management;
  - (f) operational procedures when affecting the continuing airworthiness management of the aircraft or the maintenance; and
  - (g) maintenance related human factors and human performance principles.
- 1.3 training on auditing techniques and assessing and evaluating safety management systems.
- 1.4 five years relevant work experience to be allowed to work as an inspector independently. This may include experience gained during training to obtain the subparagraph 1.5 qualification.
- 1.5 a relevant engineering degree or an aircraft maintenance technician qualification with additional education. Relevant engineering degree' means an engineering degree from aeronautical, mechanical, electrical, electronic, avionic or other studies relevant to the maintenance and continuing airworthiness of aircraft/aircraft components."
- 1.6 knowledge of a relevant sample of the type(s) of aircraft gained through a formalised training course including Fuel Tank Safety (FTS) training as described in Appendix XII to AMC to M.A.706(f) and ~~M.B.102(e)~~ M.B.110(a)(3). These courses should be at least at a level equivalent to Part-66 Appendix III Level 1 General Familiarisation.
- "Relevant sample" means that these courses should cover typical systems embodied in those aircraft being within the scope of approval.
- 1.7 knowledge of maintenance standards.
2. In addition to technical competency, inspectors should have a high degree of integrity, be impartial in carrying out their tasks, be tactful, and have a good understanding of human nature.
3. A programme for continuation training should be developed ensuring they remain competent to perform their allocated tasks. ~~which provides for the inspectors, at regular intervals, to visit appropriate manufacturers and attend technical symposia as well as training or refresher courses to gain first hand knowledge of new developments.~~ As a general policy, it is not desirable for the inspectors to obtain technical qualifications from those entities under their direct regulatory jurisdiction.

### **AMC3 M.B.110(a)(3) Management system**

#### **INITIAL AND RECURRENT TRAINING**

##### **(a) Initial training programme:**

The initial training programme for inspectors should include, as appropriate to their role, current knowledge, experience and skills in at least all of the following:

- (1) aviation legislation, organisation, and structure;
- (2) the Chicago Convention, relevant ICAO annexes and documents;
- (3) the applicable requirements and procedures;
- (4) management systems, including auditing, risk assessment, and reporting techniques;
- (5) human factors principles;

- (6) rights and obligations of inspecting personnel of the competent authority;
- (7) 'on-the-job' training; and
- (8) suitable technical training appropriate to the role and tasks of the inspector, in particular for those areas requiring approvals.

(b) Recurrent training programme:

The recurrent training programme should reflect, at least, changes in aviation legislation and industry. The programme should also cover the specific needs of the inspectors and the competent authority.

#### **AMC4 M.B.110(a)(3) Management system**

##### COMPETENCE ASSESSMENT

The competent authority should periodically assess the competence of its inspectors. The current version of 'Authority Inspectors Qualification Criteria' defined by the Common Training Initiative Group should be used. The results of such assessment, as well as any actions taken following such assessment, should be recorded.

#### ~~**AMC M.B.102 (d) Competent authority organisation – Procedures**~~

~~The documented procedures should contain the following information:~~

- ~~(a) The Member State's designation of the competent authority(ies).~~
- ~~(b) The title(s) and name(s) of the manager(s) of the competent authority and their duties and responsibilities.~~
- ~~(c) Organisation chart(s) showing associated chains of responsibility of the senior persons.~~
- ~~(d) A procedure defining the qualifications for staff together with a list of staff authorised to sign certificates.~~
- ~~(e) A general description of the facilities.~~
- ~~(f) Procedures specifying how the competent authority(ies) ensure(s) compliance with Part-M.~~

#### **AMC1 M.B.110(d) Management system**

##### PROCEDURES AVAILABLE TO THE AGENCY

- (a) Copies of the procedures related to the competent authority's management system, and their amendments to be made available to the Agency for the purpose of standardisation should provide at least the following information:
  - (1) Regarding continuing oversight functions undertaken by the competent authority, the competent authority's organisational structure with description of the main processes. This information should demonstrate the allocation of responsibilities within the competent authority, and that the competent authority is capable of carrying out the full range of tasks regarding the size and complexity of the Member State's aviation industry. It should also consider overall proficiency and authorisation scope of competent authority personnel.

- (2) For personnel involved in oversight activities, the minimum professional qualification requirements and experience and principles guiding appointment (e.g. assessment).
  - (3) How the following are carried out: assessing applications and evaluating compliance, issuance of certificates, performance of continuing oversight, follow-up of findings, enforcement measures and resolution of safety concerns.
  - (4) Principles of managing exemptions and derogations.
  - (5) Processes in place to disseminate applicable safety information for timely reaction to a safety problem.
  - (6) Criteria for planning continuing oversight (oversight programme), including adequate management of interfaces when conducting continuing oversight (air operations, continuing airworthiness management for example).
  - (7) Outline of the initial training of newly recruited oversight personnel (taking future activities into account), and the basic framework for continuation training of oversight personnel.
- (b) As part of the continuous monitoring of a competent authority, the Agency may request details of the working methods used, in addition to the copy of the procedures of the competent authority's management system (and amendments). These additional details are the procedures and related guidance material describing working methods for competent authority personnel conducting oversight.
- (c) Information related to the competent authority's management system may be submitted in electronic format.

#### **M.B.111 Allocation of tasks to qualified entities**

- (a) Tasks related to the initial certification, or continuing oversight of persons, or organisations subject to Regulation (EC) No 216/2008 and its Implementing Rules shall be allocated by Member States only to qualified entities. When allocating tasks, the competent authority shall ensure that it has:
- (1) put a system in place to initially and continuously assess that the qualified entity complies with Annex V to Regulation (EC) No 216/2008.  
This system and the results of the assessments shall be documented;
  - (2) established a documented agreement with the qualified entity, approved by both parties at the appropriate management level, which clearly defines:
    - (i) the tasks to be performed;
    - (ii) the declarations, reports, and records to be provided;
    - (iii) the technical conditions to be met in performing such tasks;
    - (iv) the related liability coverage; and
    - (v) the protection given to information acquired in carrying out such tasks.
- (b) The competent authority shall ensure that the internal audit process and safety risk management process required by M.B.110(a)(4) covers all certification, or continuing oversight tasks performed on its behalf.

**GM1 M.B.111 Allocation of tasks to qualified entities****CERTIFICATION TASKS**

The tasks that may be performed by a qualified entity on behalf of the competent authority include those related to the initial certification and continuing oversight of persons and organisations as defined in this Regulation, with the exclusion of the issuance of certificates, licences, ratings, or approvals.

**M.B.112 Changes in the management system**

- (a) The competent authority shall have a system in place to identify changes that affect its capability to perform its tasks and discharge its responsibilities as defined in Regulation (EC) No 216/2008 and its Implementing Rules. This system shall enable it to take action as appropriate to ensure that its management system remains adequate and effective.
- (b) The competent authority shall update its management system to reflect any change to Regulation (EC) No 216/2008 and its Implementing Rules in a timely manner, so as to ensure effective implementation.
- (c) The competent authority shall notify the Agency of changes affecting its capability to perform its tasks and discharge its responsibilities as defined in Regulation (EC) No 216/2008 and its Implementing Rules.

**M.B.104-114 Record keeping**

- ~~(a) The competent authorities shall establish a system of record keeping that allows adequate traceability of the process to issue, continue, change, suspend or revoke each certificate.~~
- ~~(b) The records for the oversight of Part M approved organisations shall include as a minimum:~~
  - (a) The competent authority shall establish a system of record keeping that allows adequate storage, accessibility, and reliable traceability of
    - 1. the competent authority's management system's documented policies and procedures;
    - 2. training, qualification, and authorisation of competent authority personnel;
    - 3. the allocation of tasks, covering the elements required by M.B.111, as well as the details of tasks allocated;
    - 4. certification processes and continuing oversight of certified organisations, including:
      - ~~(i)1. the application for an organisation certificate approval.~~
      - (ii) the competent authority continuing oversight programme, including all audit and inspection records.
      - ~~(iii)2. the organisation approval certificate including any changes thereto.~~
      - ~~(iv)3. a copy of the oversight audit programme listing the dates when audits are due and when audits were carried out.~~
      - the competent authority continued oversight records including all audit records.
      - ~~(v)5. copies of all formal correspondence, including Form 4 or equivalent.~~

relevant correspondence.

(vi) 6. details of findings, corrective actions, date of action closure, any exemption and enforcement actions.

(vii) 7. any audit and inspection reports issued by other competent authority any report from other competent authorities relating to the oversight of the organisation.

(viii) 8. copies of all organisation expositions or manuals and amendments thereto; and

(ix) 9. copy copies of any other document directly approved by the competent authority;

5. the evaluation and notification to the Agency of alternative means of compliance proposed by persons and organisations, and the assessment of alternative means of compliance used by the competent authority itself;

6. safety information and follow-up measures in accordance with 145.B.14; and

7. the use of flexibility provisions in accordance with Article 14 of Regulation (EC) No 216/2008;

(c) ~~The retention period for the paragraph (b) records shall be at least four years.~~

(d) 8. ~~The minimum records for the oversight of each aircraft shall include, including at least, a copy~~ copies of:

(i) 1. aircraft certificate of airworthiness,

(ii) 2. airworthiness review certificates,

(iii) 3. Section A Subpart G organisation airworthiness review recommendations,

(iv) 4. reports from the airworthiness reviews carried out directly by the competent authority Member State,

(v) 5. all relevant correspondence relating to the aircraft,

(vi) 6. details of any exemption and enforcement action(s),

(vii) 7. any document approved by the competent authority pursuant to Annex I (Part-M) or Annex III (EU OPS) of Regulation No 3922/91 Annex II (Part-ARO) of Commission Regulation (EC) No 965/2012 'Air Operations'.

(e) ~~The records specified in paragraph (d) shall be retained until two years after the aircraft has been permanently withdrawn from service.~~

(f) ~~All records specified in M.B.104 shall be made available upon request by another Member State or the Agency.~~

(b) The competent authority shall maintain a list of all organisation certificates it issued.

(c) Subject to applicable data protection law, minimum retention periods shall be:

(1) for paragraphs (a)(1) to (a)(3) records five years;

(2) for the paragraph (a)(4) records four years; and

(3) for paragraph (a)(8) records two years after the aircraft has been permanently withdrawn from service.

(d) (f) All records as specified above in M.B.104 shall be made available upon request by another Member State or the Agency.



**AMC1 M.B. ~~104~~114(a) Record keeping**

1. The record keeping system should ensure that all records are accessible whenever needed within a reasonable time. These records should be organized in a consistent way that ensures traceability and retrievability throughout the required retention period. ~~competent authority (chronological, alphabetical order, etc.).~~
2. All records containing sensitive data regarding applicants or organisations should be stored in a secure manner with controlled access to ensure confidentiality of this kind of data.
3. Records should be kept in paper form or in electronic format or a combination of both media. Records stored on microfilm or optical disc form are also acceptable. The records should remain legible and accessible throughout the required retention period. The retention period starts when the record has been created.
4. Paper systems should use robust material, which can withstand normal handling and filing. Computer systems should have at least one backup system, which should be updated within 24 hours of any new entry. Computer systems should include safeguards against unauthorised alteration of data.
- 5.3. All computer hardware used to ensure data backup should be stored in a different location from that containing the working data in an environment that ensures they remain in good condition. When hardware or software changes take place special care should be taken to ensure that all necessary data continue to be accessible at least through the full period specified in M.B.114 ~~104(c) and/or (e)~~.

**AMC1 M.B.114(a)(1) Record keeping****COMPETENT AUTHORITY MANAGEMENT SYSTEM**

Records related to the competent authority's management system should include, as a minimum and as applicable:

- (a) the documented policies and procedures;
- (b) the personnel files of competent authority personnel, with supporting documents related to training and qualifications;
- (c) the results of the competent authority's internal audit and safety risk management processes, including audit findings, corrective and preventive actions; and
- (d) the contract(s) established with qualified entities performing certification or oversight tasks on behalf of the competent authority.

**GM1 M.B.114 Record keeping****GENERAL**

Records are required to document results achieved or to provide evidence of activities performed. Records become factual when recorded. Therefore, they are not subject to version control. Even when a new record is produced covering the same issue, the previous record remains valid.

**AMC1 M.B.114(d) ~~104(f)~~ Record keeping**

The cases, when records shall be made available should be limited to:

- incidents or accidents,

- findings through the aircraft continuing airworthiness monitoring programme where organisations approved by another competent authority are involved, to determine the root cause,
- aircraft mainly operated in another Member State,
- an aircraft previously operated in another Member State,
- an organisation having approvals in several Member States.

When records are requested from another Member State, the reason for the request should be clearly stated. The records can be made available by sending a copy or by allowing their consultation

### **M.B.105 Mutual exchange of information**

- (a) ~~In order to contribute to the improvement of air safety, the competent authorities shall participate in a mutual exchange of all necessary information in accordance with Article 15 of the basic Regulation.~~
- (b) ~~Without prejudice to the competencies of the Member States, in the case of a potential safety threat involving several Member States, the concerned competent authorities shall assist each other in carrying out the necessary oversight action.~~

### **AMC M.B.105 (a) Mutual exchange of information**

~~One typical case where the mutual exchange of information is necessary is when an aircraft is transferred inside the EU according to M.A.903. When notified of such a transfer, a competent authority should inform the competent authority where the aircraft will be registered of any known problems with the aircraft being transferred. Furthermore, the competent authority where the aircraft will be registered should ensure that the former competent authority has been properly notified that the aircraft is leaving.~~

### **M.B.130 Oversight principles**

- (a) The competent authority shall verify:
  - (1) compliance with the requirements applicable to organisations prior to the issue of an organisation certificate or approval, as applicable;
  - (2) continued compliance with the applicable requirements of organisations it has certified;
  - (3) implementation of appropriate safety measures mandated by the competent authority as defined in M.B.106 (c) and (d).
- (b) This verification shall:
  - (1) be supported by documentation specifically intended to provide personnel responsible for safety oversight with guidance to perform their functions;
  - (2) provide the organisations concerned with the results of safety oversight activity;
  - (3) be based on audits and inspections, including unannounced inspections; and
  - (4) provide the competent authority with the evidence needed in case further action is required, including the measures foreseen by M.B.605 and M.B.705 'Findings'.
- (c) The scope of oversight defined in (a) and (b) shall take into account the results of past oversight activities and the safety priorities.

- (d) Where organisation facilities are located in more than one State the competent authority responsible for the certificate as defined in (a) may agree to have oversight tasks performed by the competent authority(ies) of the Member State(s) where facilities are located or by the Agency for facilities not located in a Member State. Any organisation subject to such agreement shall be informed of its existence and of its scope.
- (e) For oversight performed at facilities located in another State the competent authority responsible for the certificate as defined in (a) shall inform the competent authority of such State, or the Agency for facilities not located in a Member State, before performing any on-site audit, or inspection of such facilities.
- (f) The competent authority shall collect and process any information deemed useful for oversight, including for unannounced inspections.

#### AMC1 M.B.130(f) Oversight principles

##### GENERAL

This information should include, as a minimum:

- (a) occurrence reports received by the competent authority;
- (b) results of the following inspections and surveys when these indicate an issue originating from a Part-M organisation:
  - (i) ramp inspections performed in accordance with Subpart RAMP of Annex II (Part-ARO) of Commission Regulation (EC) No 965/2012 'Air Operations';
  - (ii) product surveys of aircraft pursuant to Part-M § M.B.303;
  - (iii) results of aircraft sample surveys conducted pursuant to M.B.704(b)(1); and
  - (iv) results of physical surveys or partial airworthiness reviews performed by the competent authority in line with M.B.901.

## SUBPART B — ACCOUNTABILITY

### **M.B.201 Responsibilities**

The competent authorities as specified in M.1 are responsible for conducting audits, inspections and investigations in order to verify that the requirements of this Regulation are complied with.

## SUBPART C — CONTINUING AIRWORTHINESS

### **M.B.301 Maintenance programme**

- (a) The competent authority shall verify that the maintenance programme is in compliance with M.A.302.
- (b) Except where stated otherwise in point M.A.302(c), the maintenance programme and its amendments shall be approved directly by the competent authority. The competent authority shall have access to all the data required in points M.A.302(d), (e), and (f).

- (c) In the case of indirect approval as provided for in point M.A.302(c), the competent authority shall approve the maintenance programme approval procedure ~~shall be approved by the competent authority~~ through the continuing airworthiness management exposition of the approving Part-M Subpart G organisation.
- (d) ~~In order to approve a maintenance programme according to paragraph (b), the competent authority shall have access to all the data required in points M.A.302(d), (e) and (f).~~

**M.B.302 Exemptions**

~~All exemptions granted in accordance with Article 14(4) of the Basic Regulation shall be recorded and retained by the competent authority.~~

## SUBPART F — MAINTENANCE ORGANISATION

**M.B.601 Application**

Where maintenance facilities are located in more than one Member State the investigation and continued oversight of the approval shall be carried out in conjunction with the competent authorities designated by the Member States in whose territory the other maintenance facilities are located.

**M.B.602 Initial certification procedure approval**

- ~~(a) Provided the requirements of M.A.606(a) and (b) are complied with, the competent authority shall formally indicate its acceptance of the M.A.606(a) and (b) personnel to the applicant in writing.~~
- ~~(b) The competent authority shall establish that the procedures specified in the maintenance organisation manual comply with M.A Subpart F and ensure the accountable manager signs the commitment statement.~~
- ~~(c) The competent authority shall verify that the organisation is in compliance with the Part M.A Subpart F requirements.~~
- ~~(d) A meeting with the accountable manager shall be convened at least once during the investigation for approval to ensure that he/she fully understands the significance of the approval and the reason for signing the commitment of the organisation to compliance with the procedures specified in the manual.~~
- ~~(e) All findings shall be confirmed in writing to the applicant organisation.~~
- ~~(f) The competent authority shall record all findings, closure actions (actions required to close a finding) and recommendations.~~
- ~~(g) For initial approval all findings shall be corrected by the organisation and closed by the competent authority before the approval can be issued.~~
- (a) Upon receiving an application for the initial issue of a certificate for an organisation, the competent authority shall verify organisation's compliance with the applicable requirements.
- (b) A meeting with the accountable manager of the organisation shall be convened at least once during the investigation for initial certification to ensure that he/she fully understands the significance of the certification process, and the reason for signing the commitment of the organisation to compliance with the procedures specified in the maintenance organisation manual.
- (c) The competent authority shall record all findings, closure actions (actions required to close a finding), and recommendations.
- (d) The competent authority shall confirm all findings raised during the verification in writing to the organisation. For initial certification, all findings must be corrected to the satisfaction of the competent authority before the certificate can be issued.
- (e) When satisfied that the organisation is in compliance with the applicable requirements, the competent authority shall:
  - (1) issue the certificate as established in Appendix III to this Part 'EASA Form 3';
  - (2) formally indicate its acceptance of the personnel, specified in M.A.606 (a) and

- (b) to the applicant in writing; and
- (3) formally approve the maintenance organisation manual.
- (f) The certificate reference number shall be included on the EASA Form 3 approval certificate in a manner specified by the Agency.
- (g) The certificate shall be issued for an unlimited duration. The privileges, scope of the activities that the organisation is approved to conduct, including any limitations as applicable, shall be specified in the terms of approval attached to the certificate.
- (h) To enable an organisation to implement changes without prior competent authority approval in accordance with M.A.617(c), the competent authority shall approve the procedure submitted by the organisation defining the scope of such changes and describing how such changes will be managed and notified.

### **AMC1 M.B.602(a) Initial certification procedure**

#### **VERIFICATION OF COMPLIANCE**

- (a) In order to verify the organisation's compliance with the applicable requirements, the competent authority should conduct an audit of the organisation, including interviews of personnel, and inspections carried out at the organisation's facilities.
- (b) The competent authority should only conduct such audit after being satisfied that the application shows compliance with the applicable requirements.
- (c) The audit should focus on the following areas:
  - (1) detailed management structure, including names and qualifications of personnel required by M.A.606 and M.A.607, and adequacy of the organisation and management structure;
  - (2) personnel:
    - (i) adequacy of number and qualifications with regard to the intended approval schedule and associated privileges;
    - (ii) validity of licences, ratings, certificates, or attestations as applicable;
  - (3) processes for safety risk management, and compliance monitoring;
  - (4) facilities — adequacy with regard to the organisation's scope of work; and
  - (5) documentation based on which the certificate should be granted (organisation documentation as required by M.A.604 and M.A.616:
    - (i) verification that the procedures specified in the maintenance organisation manual comply with the applicable requirements; and
    - (ii) verification that the accountable manager signs the commitment statement.
- (d) In cases where an application for an organisation certificate is refused, the applicant should be informed of the right of appeal as exists under national law.

**AMC2 M.B.602 (a) Initial certification procedure approval**

1. The competent authority should determine by whom, and how the audit shall be conducted. For example, it ~~will be~~ **is** necessary to determine whether one large team audit or a short series of small team audits or a long series of single ~~man~~ **inspector** audits are most appropriate for the particular situation.
2. The audit may be carried out on a product line type basis. For example, in the case of an organisation with Socata TB20 and Piper PA 28 ratings, the audit is concentrated on one type only for a full compliance check. ~~Dependant~~ **Dependent** upon the result, the second type may only require a sample check that should at least cover the activities identified as weak for the first type.
3. The competent authority auditing ~~surveyor~~ **inspector** should always ensure that he/she is accompanied throughout the audit by a senior technical member of the organisation. The reason for being accompanied is to ensure the organisation is fully aware of any findings during the audit.
4. The auditing ~~surveyor~~ **inspector** should inform the senior technical member of the organisation at the end of the audit ~~visit~~ on all findings made during the audit.

**AMC1 M.B.602(a)(e)(2) Initial certification procedure approval**

1. ~~'Formally indicate in writing' means that an EASA Form 4 (appendix X) should be used for this activity.~~ **Formally indicated by the competent authority in writing means that the EASA Form 4 should be used for this purpose.** With the exception of the accountable manager, an EASA Form 4 should be completed for each person nominated to hold a position required by M.A.606 (b)
2. In the case of the accountable manager approval of the maintenance organisation manual containing the accountable manager's signed commitment statement constitutes formal acceptance.
3. **The competent authority may reject an accountable manager where there is clear evidence that this person previously held a senior position in any organisation approved in accordance with Regulation (EU) 216/2008 and its Implementing Rules and abused that position by not complying with the applicable requirements.**

**AMC M.B.602 (b) Initial approval**

~~The competent authority should indicate approval of the maintenance organisation manual in writing.~~

**AMC1 M.B.602 (c)(f) Initial certification procedure approval****(see Appendices to Part M - Appendix VI to AMC M.B.602 (c) (f))**

1. ~~The audit report should be made on an~~ **The audit should be recorded using the audit report form EASA Form 6F (see appendix VI).**
2. A quality review of the EASA Form 6F audit report should be carried out by a competent independent person nominated by the competent authority. The review should take into account the relevant paragraphs of M.A. Subpart F, the categorisation of finding levels and the closure action taken. Satisfactory review of the audit form should be indicated by a signature on the EASA Form 6F.

3. The audit reports should include the date each finding was closed, together with reference to the competent authority report, or letter that confirmed the closure.

#### **AMC1 M.B.602 (d) ~~(e)~~ Initial certification procedure approval**

1. Findings should be recorded on an audit report form with a provisional categorisation as a level 1 or 2. Subsequent to the audit visit that identified the particular findings, the competent authority should review the provisional finding levels, adjusting them if necessary and change the categorisation from 'provisional' to 'confirmed'.
2. ~~All findings should be confirmed in writing to the applicant organisation within 2 weeks of the audit visit.~~
3. There may be occasions when the competent authority finds situations in the applicant's organisation in ~~on~~ which it is unsure about compliance. In this case, the organisation should be informed about possible non-compliance at the time and the fact that the situation will be reviewed within the competent authority before a decision is made. If the review concludes that there is no finding then a verbal confirmation to the organisation ~~should~~ will suffice.
3. All findings should be confirmed in writing to the applicant organisation within two weeks of the on-site audit visit.

#### **~~AMC M.B.602 (g) Initial approval~~**

~~The audit reports should include the date each finding was cleared together with reference to the competent authority report or letter that confirmed the clearance~~

#### **AMC1 M.B.603 ~~(a)~~ 602(g) Issue of approval Initial certification procedure approval**

1. ~~For approvals involving more than one competent authority, the approval should be granted in conjunction with the competent authorities of the Member States in whose territories the other maintenance organisation facilities are located. For practical reasons the initial approval should be granted on the basis of a joint audit visit by the approving competent authority and competent authorities of the Member States in whose territories the other maintenance organisation facilities are located. Audits related to the continuation of the approval should be delegated to the competent authorities of the Member States in whose territories the other maintenance organisation facilities are located. The resulting audit form and recommendation should then be submitted to the approving competent authority.~~

The approval should be based upon the organisational capability relative to M.A. Subpart F compliance and not limited by reference to individual EASA certificated products. For example, if the organisation is capable of maintaining within the limitation of M.A. Subpart F the Cessna 100 series aircraft the approval schedule should state A2 Cessna 100 series and not Cessna 172 RG which is a particular designator for one of many Cessna 100 series.



**M.B.603 Issue of approval**

- (a) ~~The competent authority shall issue to the applicant an EASA Form 3 approval certificate (Appendix V) which includes the extent of approval, when the maintenance organisation is in compliance with the applicable paragraphs of this Part.~~
- (b) ~~The competent authority shall indicate the conditions attached to the approval on the EASA Form 3 approval certificate.~~
- (c) ~~The reference number shall be included on the EASA Form 3 approval certificate in a manner specified by the Agency.~~

**AMC M.B.603 (c) Issue of approval**

~~The numeric sequence of the approval reference should be unique to the particular approved maintenance organisation~~

**M.B.604 Continuing oversight Oversight programme**

- (a) ~~The competent authority shall keep and update a program listing for each M.A Subpart F approved maintenance organisations under its supervision, the dates when audit visits are due and when such visits were carried out.~~
- (b) ~~Each organisation shall be completely audited at periods not exceeding 24 months.~~
- (c) ~~All findings shall be confirmed in writing to the applicant organisation.~~
- (d) ~~The competent authority shall record all findings, closure actions (actions required to close a finding) and recommendations.~~
- (e) ~~A meeting with the accountable manager shall be convened at least once every 24 months to ensure he/she remains informed of significant issues arising during audits.~~
- (a) The competent authority shall establish and maintain an oversight programme covering the oversight activities required by M.B.130.
- (b) For organisations certified by the competent authority, 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. It shall include within each oversight planning cycle:
  - (1) audits and inspections, including unannounced inspections; and
  - (2) meetings convened between the accountable manager and the competent authority to ensure both remain informed of significant issues.
- (c) For organisations certified by the competent authority, an oversight planning cycle not exceeding 24 months shall be applied.
 

The oversight planning cycle may be reduced if there is evidence that the safety performance of the organisation has decreased.
- (d) The oversight planning cycle may be extended to a maximum of 36 months if the competent authority has established that, during the previous 24 months:
  - (1) the organisation has demonstrated an effective identification of aviation safety hazards and management of associated risks;

- (2) the organisation has continuously demonstrated under M.A.617 that it has full control over all changes;
- (3) no level 1 findings have been issued; and
- (4) all corrective actions have been implemented within the time period accepted or extended by the competent authority as defined in M.B.605(d)(2).

The oversight planning cycle may be further extended to a maximum of 48 months if, in addition to the above, the organisation has established, and the competent authority has approved, an effective continuous reporting system to the competent authority on the safety performance and regulatory compliance of the organisation itself.

- (e) The oversight programme shall include records of the dates when audits, inspections, and meetings are due, and when such audits, inspections, and meetings have been carried out.
- (f) At the completion of each oversight planning cycle, the competent authority shall issue a recommendation report on the continuation of the approval which shall consider possible limitations to the terms of approval on the basis of the results of oversight, and the volume of activities for the different ratings during the completed oversight cycle.

#### **AMC1 M.B.604(a);(b) Oversight programme**

##### **ANNUAL REVIEW**

- (a) The oversight planning cycle and related oversight programme for each organisation should be reviewed annually to ensure they remain adequate with regards to any changes in the nature, complexity or safety performance of the organisation.
- (b) When reviewing the oversight planning cycle and related oversight programme, the competent authority should also consider any relevant information collected in accordance with M.B.130(f).

#### **AMC1 M.B.604(b) Oversight programme**

##### **SPECIFIC NATURE AND COMPLEXITY OF THE ORGANISATION, RESULTS OF PAST OVERSIGHT**

When determining the oversight programme for an organisation the competent authority should consider in particular the following elements, as applicable:

- (a) The effectiveness of the organisation's management system in identifying and addressing non-compliances and safety hazards;
- (b) the implementation by the organisation of industry standards, directly relevant to the organisation's activity subject to this Regulation;
- (c) the procedure applied for and scope of changes not requiring prior approval;
- (d) specific procedures implemented by the organisation related to any alternative means of compliance used;
- (e) if applicable, the number of approved locations and the activities performed at each location ; and
- (f) the volume of activity for each A, B, C and D rating, as applicable.

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**AMC2 M.B.604(b) Oversight programme**

## INDUSTRY STANDARDS

- (a) For organisations having demonstrated compliance with industry standards, the competent authority may adapt its oversight programme in order to avoid duplication of specific audit items.
- (b) Demonstrated compliance with industry standards, such as ISO 9000 series or EN 9110, should not be considered in isolation from the other elements to be considered for the competent authority's risk-based oversight.
- (c) In order to be able to credit any audits performed as part of certification in accordance with industry standards, the following should be considered:
  - (1) the demonstration of compliance is based on certification auditing schemes providing for independent and systematic verification;
  - (2) the existence of an accreditation scheme and accreditation body for certification in accordance with the industry standards has been verified;
  - (3) certification audits are relevant to the requirements defined in Part-M Subpart F and other Parts as applicable;
  - (4) the scope of such certification audits can easily be mapped against the scope of oversight in accordance with Part-M Subpart F;
  - (5) audit results are accessible to the competent authority and open to exchange of information in accordance with Article 15(1) of Regulation (EC) No 216/2008; and
  - (6) the audit planning intervals of certification audits, in accordance with industry standards are compatible with the oversight planning cycle.

**AMC1 M.B.604(b)(1) Oversight programme**

## AUDIT

- (a) The oversight programme should indicate which aspects of the approval will be covered with each audit.
- (b) Part of an audit should concentrate on the organisation's compliance monitoring reports produced by the compliance monitoring personnel to determine if the organisation is identifying and correcting its problems.
- (c) At the conclusion of the audit, an audit report using EASA Form 6F should be completed by the auditing inspector, identifying the areas and processes audited and including all findings raised.

**AMC1 M.B.604(c) Oversight programme**

## OVERSIGHT PLANNING CYCLE

- (a) When determining the oversight planning cycle and defining the oversight programme, the competent authority should assess the risks related to the activity of each organisation and adapt the oversight to the level of risk identified and to the organisation's ability to effectively manage safety risks.
- (b) The competent authority should establish a schedule of audits and inspections appropriate to each organisation. The planning of audits and inspections should take

into account the results of the hazard identification and risk assessment conducted and maintained by the organisation as part of the organisation's management system. Inspectors should work in accordance with the schedule provided to them.

- (c) When the competent authority, having regard to an organisation's safety performance, 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.

### **AMC2 M.B.604(c) Oversight programme**

#### **OVERSIGHT PLANNING CYCLE**

- (a) For each organisation certified by the competent authority, all processes should be completely audited at periods not exceeding the applicable oversight planning cycle. The beginning of the first oversight planning cycle is normally determined by the date of issue of the first certificate. If the competent authority wishes to align the oversight planning cycle with the calendar year, it should shorten the first oversight planning cycle accordingly.
- (b) The interval between two audits for a particular process should not exceed the interval of the applicable oversight planning cycle.
- (c) Audits should include at least one on-site audit within each oversight planning cycle. For organisations exercising their regular activity at more than one site, the determination of the sites to be audited should consider the results of past oversight, the volume of activity at each site, as well as main risk areas identified.
- (d) For organisations holding more than one certificate, the competent authority may define an integrated oversight schedule to include all applicable audit items. In order to avoid duplication of audits, credit may be granted for specific audit items already completed during the current oversight planning cycle, subject to four conditions:
- (1) the specific audit item should be the same for all certificates under consideration;
  - (2) there should be satisfactory evidence on record that such specific audit items were carried out, and that all corrective actions have been implemented to the satisfaction of the competent authority;
  - (3) the competent authority should be satisfied that there is no reason to believe standards have deteriorated in respect of those specific audit items being granted a credit; and
  - (4) the interval between two audits for the specific item being granted a credit should not exceed the applicable oversight planning cycle.

### **AMC M.B.604 (b) Continuing oversight**

1. Where the competent authority has decided that a series of audit visits are necessary to arrive at a complete audit of an approved maintenance organisation, the program should indicate which aspects of the approval will be covered on each visit.
2. It is recommended that part of an audit concentrates on the organisations internal self monitoring reports produced by the organisational review to determine if the organisation is identifying and correcting its problems.

- ~~3. At the successful conclusion of the audit(s) including verification of the manual, an audit report form should be completed by the auditing surveyor including all recorded findings, closure actions and recommendation. An EASA Form 6F should be used for this activity.~~
- ~~4. Credit may be claimed by the competent authority surveyor(s) for specific item audits completed during the preceding 23 month period subject to four conditions:
  - ~~(a) the specific item audit should be the same as that required by M.A. Subpart F latest amendment, and~~
  - ~~(b) there should be satisfactory evidence on record that such specific item audits were carried out and that all corrective actions have been taken, and~~
  - ~~(c) the competent authority surveyor(s) should be satisfied that there is no reason to believe standards have deteriorated in respect of those specific item audits being granted a back credit;~~
  - ~~(d) the specific item audit being granted a back credit should be audited not later than 24 months after the last audit of the item.~~~~
- ~~5. When performing the oversight of organisations that hold both M.A. Subpart F and M.A. Subpart G approvals, the competent authority should arrange the audits to cover both approvals avoiding duplicated visit of a particular area.~~

**AMC3 M.B.604(c) Oversight programme**

- (a) Where the competent authority has decided that a series of on-site audits are necessary to arrive at a complete audit of an organisation, the programme should indicate which aspects of the approval will be covered during each on-site audit.
- (b) It is recommended that the audit concentrates on two aspects of the Part-M F approval:
  - (1) the organisation's compliance monitoring based on the reports produced by the compliance monitoring function to determine if the organisation is identifying, controlling and correcting non-compliances, and controlling concessions granted by the compliance monitoring manager for deviations from the organisation's procedures; and
  - (2) the organisation's safety management processes to determine how effectively the organisation is managing safety risks.
- (c) At the successful conclusion of the audit, including approval of changes to the maintenance organisation exposition, if relevant, an audit report should be issued by the auditing inspector including all recorded findings, closure actions, and recommendation.
- (d) At the completion of each oversight planning cycle a new EASA Form 6 should be issued .

**AMC1 M.B.604 (d) Oversight programme****EXTENSION OF THE OVERSIGHT PLANNING CYCLE BEYOND 24 MONTHS**

- (a) Where the competent authority applies an oversight planning cycle that exceeds 24 months it should perform at a minimum one oversight programme validation inspection of the organisation within each 12-month segment of the applicable oversight planning cycle.
- (b) In case the results of this inspection indicate a decrease in the safety performance of the organisation, the competent authority should revert back to a 24-month oversight planning cycle and review the oversight programme accordingly.

**AMC2 M.B.604 (d) Oversight programme****EXTENSION OF THE OVERSIGHT PLANNING CYCLE BEYOND 24 MONTHS**

- (a) In order to be able to apply an oversight planning cycle up to 36 months the competent authority should determine the format and contents of the regular reports to be made by the organisation on its safety performance.
- (b) In order to be able to apply an oversight planning cycle up to 48 months the competent authority should have implemented a methodology to evaluate the safety performance of the organisation, focussing on the organisation's ability to effectively identify aviation safety hazards and manage the associated risks.

**GM1 M.B.604 Oversight programme****TERMINOLOGY**

- (a) 'Audit' means a systematic, independent, and documented process for obtaining

evidence and evaluating it objectively to determine the extent to which requirements are complied with.

- (b) 'Inspection' means an independent documented conformity evaluation by observation and judgement accompanied as appropriate by measurement, testing, or gauging in order to verify compliance with applicable requirements.
- (c) 'Oversight planning cycle' means the timeframe within which all areas of the approval and all processes should be reviewed by means of audits and inspections.
- (d) 'Oversight programme' means the detailed oversight schedule defining the number of audits and inspections, the scope and duration of each audit and inspection, including details on product audits and locations, as appropriate, and the tentative timeframe for performing each audit and inspection.

### **GM1 M.B.604(d) Oversight programme**

#### **EVALUATION OF SAFETY PERFORMANCE**

The 'Safety Management System Evaluation Tool' developed by the Safety Management International Collaboration Group may be used<sup>4</sup>.

### **M.B.605 Findings and corrective actions**

- ~~(a) When during audits or by other means evidence is found showing non-compliance to the Part M requirement, the competent authority shall take the following actions:
 
  - ~~1. For level 1 findings, immediate action shall be taken by the competent authority to revoke, limit or suspend in whole or in part, depending upon the extent of the level 1 finding, the maintenance organisation approval, until successful corrective action has been taken by the organisation.~~
  - ~~2. For level 2 findings, the competent authority shall grant a corrective action period appropriate to the nature of the finding that shall not be more than three months. In certain circumstances, at the end of this first period and subject to the nature of the finding, the competent authority can extend the three month period subject to a satisfactory corrective action plan.~~~~
- ~~(b) Action shall be taken by the competent authority to suspend in whole or part the approval in case of failure to comply within the timescale granted by the competent authority.~~
- (a) The competent authority shall have a system to analyse findings for their safety significance.
- (b) A level 1 finding shall be issued by the competent authority when any significant non-compliance is detected with the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, with the organisation's procedures and manuals, or with the terms of an approval or certificate which lowers safety or seriously hazards flight safety.

The level 1 findings shall include:

- (1) failure to give the competent authority access to the organisation's facilities as defined in M.A.618 during normal operating hours and after two written requests;

<sup>4</sup> <http://www.skybrary.aero/bookshelf/books/1774.pdf>

- (2) obtaining or maintaining the validity of the organisation certificate by falsification of submitted documentary evidence;
  - (3) evidence of malpractice or fraudulent use of the organisation certificate; and
  - (4) the lack of an accountable manager.
- (c) A level 2 finding shall be issued by the competent authority when any non-compliance is detected with the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, with the organisation's procedures and manuals, or with the terms of an approval or certificate which could lower safety or hazard flight safety.
- (d) When a finding is detected during oversight or by any other means, the competent authority shall, without prejudice to any additional action required by Regulation (EC) No 216/2008 and its Implementing Rules, communicate the finding to the organisation in writing and request corrective action to address the non-compliance(s) identified. Where a finding directly relates to an aircraft, the competent authority shall inform the State in which the aircraft is registered.
- (1) In the case of level 1 findings, the competent authority shall take immediate and appropriate action to prohibit or limit activities, and if appropriate, it shall take action to revoke the certificate, or to limit, or suspend it in whole or in part, depending upon the extent of the level 1 finding, until successful corrective action has been taken by the organisation.
  - (2) In the case of level 2 findings, the competent authority shall:
    - (i) grant the organisation a corrective action implementation period appropriate to the nature of the finding that in any case initially shall not be more than three months. At the end of this period, and subject to the nature of the finding, and past safety performance of the organisation, the competent authority may extend the three-month period subject to a satisfactory corrective action plan agreed by the competent authority; and
    - (ii) assess the corrective action and implementation plan proposed by the organisation and, if the assessment concludes that they are sufficient to address the non-compliance(s), accept these.
  - (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 the competent authority, the finding shall be raised to a level 1 finding and action taken as laid down in (d)(1).
  - (4) The competent authority shall record all findings it has raised, or that have been communicated to it and, where applicable, the enforcement measures it has applied, as well as all corrective actions and date of action closure for findings.
- (e) Without prejudice to any additional enforcement measures, when the authority of a Member State acting under the provisions of M.B.130(d) identifies any non-compliance with the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules by an organisation certified by the competent authority of another Member State or the Agency, it shall inform that competent authority and provide an indication of the level of finding.

#### **AMC1 M.B.605(a)-1-(d)(1) Findings and corrective actions**

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



**M.B.606 Changes**

- ~~(a) The competent authority shall comply with the applicable elements of the initial approval for any change to the organisation notified in accordance with point M.A.617.~~
- ~~(b) The competent authority may prescribe the conditions under which the approved maintenance organisation may operate during such changes, unless it determines that the approval should be suspended due to the nature or the extent of the changes.~~
- ~~(c) For any change to the maintenance organisation manual:~~
- ~~1. In the case of direct approval of changes in accordance with point M.A.604(b), the competent authority shall verify that the procedures specified in the manual are in compliance with this Annex (Part M) before formally notifying the approved organisation of the approval.~~
  - ~~2. In the case an indirect approval procedure is used for the approval of the changes in accordance with point M.A.604(c), the competent authority shall ensure~~
    - ~~(i) that the changes remain minor and~~
    - ~~(ii) that it has an adequate control over the approval of the changes to ensure they remain in compliance with the requirements of this Annex (Part M).~~
- (a) Upon receiving an application for a change that requires prior approval, the competent authority shall verify the organisation's compliance with the applicable requirements before issuing the approval.
- (b) The competent authority shall prescribe the conditions under which the organisation may operate during the change unless the competent authority determines that the organisation's certificate needs to be suspended.
- (c) When satisfied that the organisation is in compliance with the applicable requirements, the competent authority shall approve the change.
- (d) Without prejudice to any additional enforcement measures, when the organisation implements changes requiring prior approval without having received competent authority approval as defined in (c), the competent authority shall suspend, limit, or revoke the organisation's certificate.
- (e) For changes not requiring prior approval, the competent authority shall assess the information provided in the notification sent by the organisation in accordance with M.A.617(c) to verify compliance with the applicable requirements. In case of any non-compliance, the competent authority shall:
- (1) notify the organisation about the non-compliance and request further changes; and
  - (2) in case of level 1 or level 2 findings, act in accordance with M.B.605 'Findings'.

**AMC1 M.B.606 Changes**

- ~~1. Changes in nominated persons~~
  - ~~The competent authority should have adequate control over any changes to personnel specified in M.A.606 (a) and (b). Such changes will require an amendment to the manual.~~
2. It is recommended that a simple manual status sheet is maintained which contains

~~information on when an amendment was received by the competent authority and when it was approved.~~

- ~~3. The competent authority should define the minor amendments to the manual which may be incorporated through indirect approval. In this case a procedure should be stated in the amendment section of the maintenance organisation manual.~~

~~Changes notified in accordance with M.A.617 are not considered minor.~~

~~For all cases other than minor, the applicable part(s) of the EASA Form 6F should be used for the change.~~

- ~~4. The approved maintenance organisation should submit each manual amendment to the competent authority whether it be an amendment for competent authority approval or an indirectly approved amendment. Where the amendment requires competent authority approval, the competent authority when satisfied, should indicate its approval in writing. Where the amendment has been submitted under the indirect approval procedure the competent authority should acknowledge receipt in writing.~~

(a). The competent authority should have adequate control over any changes to the management personnel specified in M.A.606(a) and (b). Such changes in management personnel will require an amendment to the maintenance organisation exposition.

(b) When an organisation submits the name of a new nominee for any of the management personnel specified in M.A.606(a) and (b), the competent authority may require the organisation to produce a written résumé of the proposed person's qualifications, in addition to the EASA Form 4 to be provided, as applicable. The competent authority should reserve the right to interview the nominee, or call for additional evidence of his/her suitability before deciding upon his/her acceptability.

(c) For changes requiring prior approval, in order to verify the organisation's compliance with the applicable requirements, the competent authority should conduct an audit of the organisation, limited to the extent of the changes and determine the need for a safety risk assessment to be provided by the organisation. If a safety risk assessment is deemed necessary, the competent authority should inform the organisation accordingly. If required for verification, the audit should include interviews and inspections carried out at the organisation's facilities. If requested, the competent authority should assess the results of the safety risk assessment provided by the organisation.

(d) The applicable part(s) of the EASA Form 6F should be used to document the assessment of changes to the Part-M Subpart F approval.

## **GM1 M.B.606 Changes**

### **CHANGE OF NAME OF THE ORGANISATION**

(a) On receipt of the application and the amendment to the relevant parts of the maintenance organisation exposition, the competent authority should reissue the certificate.

(b) A name change alone does not require the competent authority to audit the organisation unless there is evidence that other aspects of the organisation have changed.

**M.B.607 Suspension, limitation and revocation ~~Revocation, suspension and limitation of an approval~~**

The competent authority shall:

- (a) suspend an approval on reasonable grounds in the case of potential safety threat, or;
- (b) suspend, revoke or limit an approval pursuant to M.B.605.

## SUBPART G — CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION

### **M.B.701 Application**

- (a) ~~For commercial air transport the competent authority shall receive for approval with the initial application for the air operator's certificate and where applicable any variation applied for and for each aircraft type to be operated:~~
- ~~1. the continuing airworthiness management exposition;~~
  - ~~2. the operator's aircraft maintenance programmes;~~
  - ~~3. the aircraft technical log;~~
  - ~~4. where appropriate the technical specification of the maintenance contracts between the operator and Part 145 approved maintenance organisation.~~
- (b) ~~Where facilities are located in more than one Member State the investigation and continued oversight of the approval shall be carried out in conjunction with the competent authorities designated by the Member States in whose territory the other facilities are located.~~

### **AMC M.B.701 (a) Application**

- ~~1. The competent authority should not expect the documents listed in M.B.701 (a) to be submitted in a completed state with the initial application for grant or change since each may require approval in its own right and may be subject to amendment as a result of competent authority assessment during the technical investigations. Draft documents should be submitted at the earliest opportunity so that investigation of the application can begin. Grant or change cannot be achieved until the competent authority is in possession of completed documents.~~
  - ~~2. This information is required to enable the competent authority to conduct its investigation, to assess the volume of maintenance work necessary and the locations at which it will be accomplished.~~
  - ~~3. The applicant should inform the competent authority where base and scheduled line maintenance is to take place and give details of any contracted maintenance which is in addition to that provided in response to M.A.201 (h) 2 or M.A.708 (c).~~
  - ~~4. At the time of application, the operator should have arrangements for all base and scheduled line maintenance in place for an appropriate period of time, as accepted to the competent authority. The operator should establish further arrangements in due course before the maintenance is due.~~
- ~~— Base maintenance contracts for high life time checks may be based on one time contracts, when the competent authority considers that this is compatible with the operator's fleet size~~

### **M.B.702 Initial certification procedure approval**

- (a) ~~Provided the requirements of M.A.706(a), (c), (d) and M.A.707 are complied with, the competent authority shall formally indicate its acceptance of the M.A.706(a), (c), (d) and M.A.707 personnel to the applicant in writing.~~

- ~~(b) The competent authority shall establish that the procedures specified in the continuing airworthiness management exposition comply with Part M.A. Subpart G and ensure the accountable manager signs the commitment statement.~~
- ~~(c) The competent authority shall verify the organisation's compliance with M.A. Subpart G requirements.~~
- ~~(d) A meeting with the accountable manager shall be convened at least once during the investigation for approval to ensure that he/she fully understands the significance of the approval and the reason for signing the exposition commitment of the organisation to compliance with the procedures specified in the continuing airworthiness management exposition.~~
- ~~(e) All findings shall be confirmed in writing to the applicant organisation.~~
- ~~(f) The competent authority shall record all findings, closure actions (actions required to close a finding) and recommendations.~~
- ~~(g) For initial approval all findings shall be corrected by the organisation and closed by the competent authority before the approval can be issued.~~
- (a) Upon receiving an application for the initial issue of a certificate for an organisation, the competent authority shall verify organisation's compliance with the applicable requirements.
- (b) A meeting with the accountable manager of the organisation shall be convened at least once during the investigation for initial certification to ensure that he/she fully understands the significance of the certification process, and the reason for signing the commitment of the organisation to compliance with the procedures specified in the exposition.
- (c) The competent authority shall record all findings, closure actions (actions required to close a finding), and recommendations.
- (d) The competent authority shall confirm all findings raised during the verification in writing to the organisation. For initial certification, all findings must be corrected to the satisfaction of the competent authority before the certificate can be issued.
- (e) When satisfied that the organisation is in compliance with the applicable requirements, the competent authority shall:
  - (1) issue the certificate as established in Appendix III to this Part 'EASA Form 3';
  - (2) formally indicate its acceptance of the personnel, specified in M.A.706(a) to (d), to the applicant in writing; and
  - (3) formally approve the continuing airworthiness management exposition.
- (f) The certificate reference number shall be included on the EASA Form 14 approval certificate in a manner specified by the Agency.
- (g) The certificate shall be issued for an unlimited duration. The privileges, scope of the activities that the organisation is approved to conduct, including any limitations as applicable, shall be specified in the terms of approval attached to the certificate.
- (h) To enable an organisation to implement changes without prior competent authority approval in accordance with M.A.713(c), the competent authority shall approve the procedure submitted by the organisation defining the scope of such changes and describing how such changes will be managed and notified.

**AMC1 702(a) Initial certification procedure****VERIFICATION OF COMPLIANCE**

- (a) In order to verify the organisation's compliance with the applicable requirements, the competent authority should conduct an audit of the organisation, including interviews of personnel, and inspections carried out at the organisation's facilities.
- (b) The competent authority should only conduct such audit after being satisfied that the application shows compliance with the applicable requirements.
- (c) The audit should focus on the following areas:
  - (1) detailed management structure, including names and qualifications of personnel required by M.A.706(a) to (d), and adequacy of the organisation and management structure;
  - (2) personnel:
    - (i) adequacy of number and qualifications with regard to the intended approval schedule, and associated privileges; and
    - (ii) validity of licences, ratings, certificates, or attestations as applicable;
  - (3) processes for safety risk management and compliance monitoring;
  - (4) facilities — adequacy with regard to the organisation's scope of work; and
  - (5) documentation based on which the certificate should be granted (documentation as required by M.A.704, M.A.709 and M.A.712:
    - (i) verification that the procedures specified in the continuing airworthiness management exposition comply with the applicable requirements; and
    - (ii) verification that the accountable manager signs the commitment statement.
- (d) In cases where an application for an organisation certificate is refused, the applicant should be informed of the right of appeal as exists under national law

**AMC2 M.B.702 (a) ~~(e)~~ Initial certification procedure approval**

- ~~1.~~ (a) The competent authority should determine by whom, and how the audit shall be conducted. For example, it will be necessary to determine whether one large team audit or a short series of small team audits or a long series of single ~~man~~ inspector audits are most appropriate for the particular situation.
- ~~2.~~ (b) The audit may be ~~carried out~~ structured so as to verify the organisation's processes related to ~~one~~ a product line ~~type~~ basis. For example, in the case of an organisation with Airbus A320 and Airbus A310 ratings, the audit is concentrated on the continuing airworthiness management processes of one type only for a full compliance check. ~~Dependant~~ Dependent upon the result, the second type may only require a sample check that should at least cover the activities identified as weak for the first type.
- ~~3.~~ (c) When determining the scope of the audit and which activities of the organisation will be assessed during the audit, the privileges of the approved organisation should be taken into account, e.g. approval to carry out airworthiness reviews.
- ~~4.~~ (d) The competent authority auditing ~~surveyor~~ inspector should always ensure that he/she is accompanied throughout the audit by a senior technical member of the

organisation. Normally this is the compliance monitoring quality manager. The reason for being accompanied is to ensure the organisation is fully aware of any findings during the audit.

5. (e) The auditing surveyor or inspector should inform the senior technical member of the organisation at the end of the audit visit on all findings made during the audit.

#### **AMC1 M.B.702 (e) (c) Initial certification procedure approval**

1. (a) Findings should be recorded on an audit report form with a provisional categorisation as a level 1 or 2. Subsequent to the audit visit that identified the particular findings, the competent authority should review the provisional finding levels, adjusting them if necessary and change the categorisation from 'provisional' to 'confirmed'.
2. All findings should be confirmed in writing to the applicant organisation within 2 weeks of the audit visit.
3. (b) There may be occasions when the competent authority inspector finds situations in the applicant's organisation on which it is unsure about compliance. In this case, the organisation should be informed about possible non-compliance at the time and the fact that the situation will be reviewed within the competent authority before a decision is made. If the review concludes that there is no finding then a verbal confirmation to the organisation should suffice.
- (c) All findings should be confirmed in writing to the applicant organisation within two weeks of the on-site audit visit.

#### **AMC2 M.B.702 (f)(c) Initial certification procedure approval**

##### **(see Appendices to Part M - Appendix VII to AMC M.B.702(f) (c))**

1. (a) The audit report form should be the The audit should be recorded using the audit report form EASA Form 13 (appendix VII).
2. (b) A quality review of the EASA Form 13 audit report should be carried out by a competent independent person nominated by the competent authority. The review should take into account the relevant paragraphs of M.A. Subpart G, the categorisation of finding levels and the closure action taken. Satisfactory review of the audit form should be indicated by a signature on the EASA Form 13.
- (c) The audit reports should include the date each finding was closed together with reference to the competent authority report, or letter that confirmed the closure.

#### **AMC1 M.B.702 (a) (e)(2) Initial certification procedure approval (see Appendices to Part M - Appendix VII to AMC M.B.702(c))**

1. (a) 'Formally indicate in writing' means that an EASA Form 4 should be used for this activity. 'Formally indicated by the competent authority in writing' means that the EASA Form 4 should be used for this purpose. With the exception of the accountable manager, an EASA Form 4 should be completed for each person nominated to hold a position required by M.A.706 (c), M.A.706(d) and M.A.707.
2. (b) In the case of the accountable manager, approval of the continuing airworthiness management exposition containing the accountable manager's signed commitment statement constitutes formal acceptance, once the authority has held a meeting

~~with the accountable manager and is satisfied with its results.~~

3. (c) The competent authority may reject an accountable manager where there is clear evidence that this person previously held a senior position in any organisation approved in accordance with Regulation (EU) 216/2008 and its Implementing Rules and abused that position by not complying with the applicable requirements.

**AMC1 M.B.702(b)(e)(3) Initial certification procedure approval**

1. (a) The competent authority should indicate approval of the continuing airworthiness management exposition in writing.
2. (b) Contracts for subcontracting continuing airworthiness management tasks by operators should be included in the continuing airworthiness organisation exposition. The competent authorities should verify that the standards set forth in AMC M.A.201 (h) 1 have been met when approving the exposition
3. (c) The competent authority while investigating the acceptability of the proposed subcontracted continuing airworthiness management tasks arrangements ~~will~~ **should** take into account, in the subcontracted organisation, all other such contracts that are in place irrespective of State of Registry in terms of sufficiency of resources, expertise, management structure, facilities and liaison between the contracting continuing airworthiness management organisation, the subcontracted organisation and where applicable contracted Part-145 maintenance organisation(s).

**AMC M.B.702 (g) Initial approval**

~~The audit reports should include the date each finding was cleared together with reference to the competent authority report or letter that confirmed the clearance.~~



**AMC GM1 M.B.703 702(e)(1) ~~Issue of approval~~ Initial certification procedure**

The table shown for the Approval Schedule in EASA Form 14 includes a field designated as "Aircraft type/series/group". The intention is to give maximum flexibility to the competent authority to customise the approval to a particular organisation.

Possible alternatives to be included in this field are the following:

- A specific type designation that is part of a type certificate, such as Airbus 340-211 or Cessna 172R.
- A type rating (or series) as listed in Part-66 Appendix I to AMC, which may be further subdivided, such as Boeing 737-600/700/800, Boeing 737-600, Cessna 172 Series.
- An aircraft group such as Cessna single piston engined aircraft.

Reference to the engine type installed in the aircraft may or may not be included, as necessary.

In all cases, the competent authority should be satisfied that the organisation has the capability to manage the requested types/groups/series.

**M.B.703 Issue of approval**

- ~~(a) The competent authority shall issue to the applicant an EASA Form 14 approval certificate (Appendix VI) which includes the extent of approval, when the continuing airworthiness management organisation is in compliance with M.A. Subpart G.~~
- ~~(b) The competent authority shall indicate the validity of the approval on the EASA Form 14 approval certificate.~~
- ~~(c) The reference number shall be included on the Form 14 approval certificate in a manner specified by the Agency.~~
- ~~(d) In the case of commercial air transport, the information contained on an EASA Form 14 will be included on the air operator's certificate.~~

**AMC M.B.703 (a) Issue of approval**

- ~~1. For approvals involving more than one competent authority, the approval should be granted in conjunction with the competent authority of the Member States in whose territories the other continuing airworthiness management organisation facilities are located. For practical reasons the initial approval should be granted on the basis of a joint audit visit by the approving competent authority and competent authority of the Member States in whose territories the other continuing airworthiness management organisation facilities are located. Audits related to the renewal of the approval should be delegated to the competent authority of the Member States in whose territories the other continuing airworthiness management organisation facilities are located. The resulting audit form and recommendation should then be submitted to the approving competent authority.~~

**AMC M.B.703 (c) Issue of approval**

~~The numeric sequence should be unique to the particular M.A. Subpart G Continuing Airworthiness Management Organisation~~

**M.B.704 ~~Continuing oversight~~ Oversight programme**

- (a) ~~The competent authority shall keep and update a program listing for each M.A. Subpart G approved continuing airworthiness organisations under its supervision, the dates when audit visits are due and when such visits were carried out.~~
- (b) ~~Each organisation shall be completely audited at periods not exceeding 24 months.~~
- (c) ~~A relevant sample of the aircraft managed by the M.B. Subpart G approved organisation shall be surveyed in every 24 month period. The size of the sample will be decided by the competent authority based on the result of prior audits and earlier product surveys.~~
- (d) ~~All findings shall be confirmed in writing to the applicant organisation.~~
- (e) ~~The competent authority shall record all findings, closure actions (actions required to close a finding) and recommendations.~~
- (f) ~~A meeting with the accountable manager shall be convened at least once every 24 months to ensure he/she remains informed of significant issues arising during audits.~~
- (a) The competent authority shall establish and maintain an oversight programme covering the oversight activities required by M.B.130.
- (b) For organisations certified by the competent authority, 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. It shall include within each oversight planning cycle:
- (1) audits and inspections, including unannounced inspections and product audits of a relevant sample of aircraft managed by the organisation, and
  - (2) meetings convened between the accountable manager and the competent authority to ensure both remain informed of significant issues.
- (c) For organisations certified by the competent authority, an oversight planning cycle not exceeding 24 months shall be applied.
- The oversight planning cycle may be reduced if there is evidence that the safety performance of the organisation has decreased.
- (d) The oversight planning cycle may be extended to a maximum of 36 months if the competent authority has established that, during the previous 24 months:
- (1) the organisation has demonstrated an effective identification of aviation safety hazards and management of associated risks;
  - (2) the organisation has continuously demonstrated under 145.A.85 that it has full control over all changes;
  - (3) no level 1 findings have been issued; and
  - (4) all corrective actions have been implemented within the time period accepted or extended by the competent authority as defined in 145.B.50(d)(2).
- The oversight planning cycle may be further extended to a maximum of 48 months if, in addition to the above, the organisation has established, and the competent authority has approved, an effective continuous reporting system to the competent authority on the safety performance and regulatory compliance of the organisation itself.
- (e) The oversight programme shall include records of the dates when audits, inspections and meetings are due, and when such audits, inspections, and meetings have been carried out.

- (f) At the completion of each oversight planning cycle, the competent authority shall issue a recommendation report on the continuation of the approval which shall consider possible limitations to the terms of approval on the basis of the results of oversight, and the volume of activities for the different ratings during the completed oversight cycle.

#### **AMC1 M.B.704(a);(b) Oversight programme**

##### **ANNUAL REVIEW**

- (a) The oversight planning cycle and related oversight programme for each organisation should be reviewed annually to ensure they remain adequate with regards to any changes in the nature, complexity or safety performance of the organisation.
- (b) When reviewing the oversight planning cycle and related oversight programme, the competent authority should also consider any relevant information collected in accordance with 145.A.60 and 145.B.30(f).

#### **AMC1 M.B.704(b) Oversight programme**

##### **SPECIFIC NATURE AND COMPLEXITY OF THE ORGANISATION, RESULTS OF PAST OVERSIGHT**

- (a) When determining the oversight programme, including the relevant sample of aircraft managed by the organisation for the product audits, the competent authority should consider in particular the following elements, as applicable:
- (1) The effectiveness of the organisation's management system in identifying and addressing non-compliances and safety hazards;
  - (2) the implementation by the organisation of industry standards, directly relevant to the organisation's activity subject to this Regulation;
  - (3) the procedure applied for and scope of changes not requiring prior approval;
  - (4) specific procedures implemented by the organisation related to any alternative means of compliance used;
  - (5) if applicable, the number of approved locations and the activities performed at each location ; and
  - (6) the volume of activity for each rating, as applicable.
- (b) For the purpose of assessing the complexity of an organisation's management system, AMC1 M.A.712(b) should be used.

#### **AMC2 M.B.704(b) Oversight programme**

##### **INDUSTRY STANDARDS**

- (a) For organisations having demonstrated compliance with industry standards, the competent authority may adapt its oversight programme, in order to avoid duplication of specific audit items.
- (b) Demonstrated compliance with industry standards, such as ISO 9000 series or EN 9110, should not be considered in isolation from the other elements to be considered for the competent authority's risk-based oversight.

- (c) In order to be able to credit any audits performed as part of certification in accordance with industry standards, the following should be considered:
- (1) the demonstration of compliance is based on certification auditing schemes providing for independent and systematic verification;
  - (2) the existence of an accreditation scheme and accreditation body for certification in accordance with the industry standards has been verified;
  - (3) certification audits are relevant to the requirements defined in Part-M Subpart G and other Parts as applicable;
  - (4) the scope of such certification audits can easily be mapped against the scope of oversight in accordance with Part-M Subpart G;
  - (5) audit results are accessible to the competent authority, and open to exchange of information in accordance with Article 15(1) of Regulation (EC) No 216/2008; and
  - (6) the audit planning intervals of certification audits in accordance with industry standards are compatible with the oversight planning cycle.

#### **AMC1 M.B.704(b)(1) Oversight programme**

##### **AUDIT**

- (a) The oversight programme should indicate which aspects of the approval will be covered with each audit.
- (b) Part of an audit should concentrate on the organisation's compliance monitoring reports produced by the compliance monitoring function to determine if the organisation is identifying, and correcting its problems.
- (c) At the conclusion of the audit, an audit report should be completed by the auditing inspector identifying the areas and processes audited and including all findings raised.
- (d) At the completion of each oversight planning cycle a new EASA Form 13 should be issued .

#### **AMC1 M.B.704(c) Oversight programme**

##### **OVERSIGHT PLANNING CYCLE**

- (a) When determining the oversight planning cycle and defining the oversight programme, the competent authority should assess the risks related to the activity of each organisation and adapt the oversight to the level of risk identified and to the organisation's ability to effectively manage safety risks.
- (b) The competent authority should establish a schedule of audits and inspections appropriate to each organisation. The planning of audits and inspections should take into account the results of the hazard identification and risk assessment conducted and maintained by the organisation as part of the organisation's management system. Inspectors should work in accordance with the schedule provided to them.
- (c) When the competent authority, having regard to an organisation's safety performance, 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.

**AMC2 M.B.704(c) Oversight programme****OVERSIGHT PLANNING CYCLE**

- (a) For each organisation certified by the competent authority, all processes should be completely audited at periods not exceeding the applicable oversight planning cycle. The beginning of the first oversight planning cycle is normally determined by the date of issue of the first certificate. If the competent authority wishes to align the oversight planning cycle with the calendar year, it should shorten the first oversight planning cycle accordingly.
- (b) The interval between two audits for a particular process should not exceed the interval of the applicable oversight planning cycle.
- (c) Audits should include at least one on-site audit within each oversight planning cycle. For organisations exercising their regular activity at more than one site, the determination of the sites to be audited should consider the results of past oversight, the volume of activity at each site, as well as main risk areas identified.
- (d) For organisations holding more than one certificate, the competent authority may define an integrated oversight schedule to include all applicable audit items. In order to avoid duplication of audits, credit may be granted for specific audit items already completed during the current oversight planning cycle, subject to four conditions:
  - (1) the specific audit item should be the same for all certificates under consideration;
  - (2) there should be satisfactory evidence on record that such specific audit items were carried out and that all corrective actions have been implemented to the satisfaction of the competent authority;
  - (3) the competent authority should be satisfied that there is no reason to believe standards have deteriorated in respect of those specific audit items being granted a credit; and
  - (4) the interval between two audits for the specific item being granted a credit should not exceed the applicable oversight planning cycle.

**AMC3 M.B.704(b)(c) ~~Continuing oversight~~ Oversight programme**

- ~~1. Where the competent authority has decided that a series of audit visits are necessary to arrive at a complete audit of an approved continuing airworthiness management organisation, the program should indicate which aspects of the approval will be covered on each visit.~~
- ~~2. It is recommended that part of an audit concentrates on two ongoing aspects of the M.A. Subpart G approval, namely the organisations internal self monitoring quality reports produced by the quality monitoring personnel to determine if the organisation is identifying and correcting its problems and secondly the number of concessions granted by the quality manager.~~
- ~~3. At the successful conclusion of the audit(s) including verification of the exposition, an audit report form should be completed by the auditing surveyor inspector including all recorded findings, closure actions and recommendation. An EASA Form 13 should be used for this activity.~~
- ~~4. Credit may be claimed by the competent authority surveyor(s) for specific item audits completed during the preceding 23 month period subject to four conditions:
 
  - a the specific item audit should be the same as that required by M.A. Subpart G~~

- latest amendment, and
- ~~b — there should be satisfactory evidence on record that such specific item audits were carried out and that all corrective actions have been taken, and~~
  - ~~c — the competent authority surveyor(s) should be satisfied that there is no reason to believe standards have deteriorated in respect of those specific item audits being granted a back credit;~~
  - ~~d — the specific item audit being granted a back credit should be audited not later than 24 months after the last audit of the item.~~
5. When an **commercial air transport operator** subcontracts continuing airworthiness management tasks all subcontracted organisations should also be audited by the competent authority of operator at periods not exceeding the applicable oversight **planning cycle 24 months** (credits per **AMC2 M.B.704(c) point (d) paragraph 4 above** are permitted) to ensure they fully comply with M.A. Subpart G. For these audits, the competent authority auditing surveyor should always ensure that he/she is accompanied throughout the audit by a senior technical member of the operator. All findings should be sent to and corrected by the operator.
6. ~~When performing the oversight of organisations that hold both M.A. Subpart F and M.A. Subpart G approvals, the competent authority should arrange the audits to cover both approvals avoiding duplicated visit of a particular area.~~

#### **AMC1 M.B.704(d) Oversight programme**

##### **EXTENSION OF THE OVERSIGHT PLANNING CYCLE BEYOND 24 MONTHS**

- (a) Where the competent authority applies an oversight planning cycle that exceeds 24 months it should perform at a minimum one oversight programme validation inspection of the organisation within each 12-month segment of the applicable oversight planning cycle.
- (b) In case the results of this inspection indicate a decrease in the safety performance of the organisation, the competent authority should revert back to a 24-month oversight planning cycle and review the oversight programme accordingly.

#### **AMC2 M.B.704(d) Oversight programme**

##### **EXTENSION OF THE OVERSIGHT PLANNING CYCLE BEYOND 24 MONTHS**

- (a) In order to be able to apply an oversight planning cycle up to 36 months the competent authority should determine the format and contents of the regular reports to be made by the organisation on its safety performance.
- (b) In order to be able to apply an oversight planning cycle up to 48 months the competent authority should have implemented a methodology to evaluate the safety performance of the organisation, focussing on the organisation's ability to effectively identify aviation safety hazards and manage the associated risks.

#### **GM1 M.B.704 Oversight programme**

##### **TERMINOLOGY**

- (a) 'Audit' means a systematic, independent, and documented process for obtaining

evidence and evaluating it objectively to determine the extent to which requirements are complied with.

- (b) 'Inspection' means an independent documented conformity evaluation by observation and judgement accompanied as appropriate by measurement, testing, or gauging in order to verify compliance with applicable requirements.
- (c) 'Oversight planning cycle' means the timeframe within which all areas of the approval and all processes should be reviewed by means of audits and inspections.
- (d) 'Oversight programme' means the detailed oversight schedule defining the number of audits and inspections, the scope and duration of each audit and inspection, including details on product audits and locations, as appropriate, and the tentative timeframe for performing each audit and inspection.

### **GM1 M.B.704 (d) Oversight programme**

#### **EVALUATION OF SAFETY PERFORMANCE**

The 'Safety Management System Evaluation Tool' developed by the Safety Management International Collaboration Group may be used<sup>5</sup>.

### **M.B.705 Findings and corrective actions**

- ~~(a) When during audits or by other means evidence is found showing non-compliance to the Part M requirement, the competent authority shall take the following actions:
 
  - ~~1. For level 1 findings, immediate action shall be taken by the competent authority to revoke, limit or suspend in whole or in part, depending upon the extent of the level 1 finding, the continuing airworthiness management organisation approval, until successful corrective action has been taken by the organisation.~~
  - ~~2. For level 2 findings, the competent authority shall grant a corrective action period appropriate to the nature of the finding that shall not be more than three months. In certain circumstances, at the end of this first period, and subject to the nature of the finding the competent authority can extend the three month period subject to a satisfactory corrective action plan.~~~~
- ~~(b) Action shall be taken by the competent authority to suspend in whole or part the approval in case of failure to comply within the timescale granted by the competent authority.~~

- (a) The competent authority shall have a system to analyse findings for their safety significance.
- (b) A level 1 finding shall be issued by the competent authority when any significant non-compliance is detected with the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, with the organisation's procedures and manuals, or with the terms of an approval or certificate which lowers safety or seriously hazards flight safety.

The level 1 findings shall include:

<sup>5</sup> <http://www.skybrary.aero/bookshelf/books/1774.pdf>

- (1) failure to give the competent authority access to the organisation's facilities as defined in M.A.715 during normal operating hours and after two written requests;
  - (2) obtaining or maintaining the validity of the organisation certificate by falsification of submitted documentary evidence;
  - (3) evidence of malpractice or fraudulent use of the organisation certificate; and
  - (4) the lack of an accountable manager.
- (c) A level 2 finding shall be issued by the competent authority when any non-compliance is detected with the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, with the organisation's procedures and manuals, or with the terms of an approval or certificate which could lower safety or hazard flight safety.
- (d) When a finding is detected during oversight or by any other means, the competent authority shall, without prejudice to any additional action required by Regulation (EC) No 216/2008 and its Implementing Rules, communicate the finding to the organisation in writing, and request corrective action to address the non-compliance(s) identified. Where a finding directly relates to an aircraft, the competent authority shall inform the State in which the aircraft is registered.
- (1) In the case of level 1 findings, the competent authority shall take immediate and appropriate action to prohibit or limit activities, and if appropriate, it shall take action to revoke the certificate or to limit or suspend it in whole or in part, depending upon the extent of the level 1 finding until successful corrective action has been taken by the organisation.
  - (2) In the case of level 2 findings, the competent authority shall:
    - (i) grant the organisation a corrective action implementation period appropriate to the nature of the finding that in any case initially shall not be more than three months. At the end of this period, and subject to the nature of the finding and past safety performance of the organisation, the competent authority may extend the three-month period subject to a satisfactory corrective action plan agreed by the competent authority; and
    - (ii) assess the corrective action and implementation plan proposed by the organisation and, if the assessment concludes that they are sufficient to address the non-compliance(s), accept these.
  - (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 the competent authority, the finding shall be raised to a level 1 finding and action taken as laid down in (d)(1).
  - (4) The competent authority shall record all findings it has raised or that have been communicated to it and, where applicable, the enforcement measures it has applied, as well as all corrective actions and date of action closure for findings.
- (e) Without prejudice to any additional enforcement measures, when the authority of a Member State acting under the provisions of M.B.130(d) identifies any non-compliance with the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules by an organisation certified by the competent authority of another Member State or the Agency, it shall inform that competent authority and provide an indication of the level of finding.



**AMC1 M.B.705 (a)–1(d)(1) Findings and corrective actions**

1. For a level 1 finding the competent authority should inform the owner/operator and the competent authority of the State of Registry, if different, of any potentially affected aircraft in order that corrective action can be taken to ensure possible unsafe conditions on these aircraft are corrected before further flight.
2. Furthermore, a level 1 finding could lead to a non-compliance to be found on an aircraft as specified in M.B.303(g). In this case, proper action as specified in M.B.303(h) would be taken.

**M.B.706 Changes**

- ~~(a) The competent authority shall comply with the applicable elements of the initial approval for any change to the organisation notified in accordance with point M.A.713.~~
- ~~(b) The competent authority may prescribe the conditions under which the approved continuing airworthiness management organisation may operate during such changes unless it determines that the approval should be suspended due to the nature or the extent of the changes.~~
- ~~(c) For any change to the continuing airworthiness management exposition:~~
- ~~1. In the case of direct approval of changes in accordance with M.A.704(b), the competent authority shall verify that the procedures specified in the exposition are in compliance with this Annex (Part M) before formally notifying the approved organisation of the approval.~~
  - ~~2. In the case an indirect approval procedure is used for the approval of the changes in accordance with point M.A.704(c), the competent authority shall ensure~~
    - ~~(i) that the changes remain minor and~~
    - ~~(ii) that it has an adequate control over the approval of the changes to ensure they remain in compliance with the requirements of this Annex (Part M).~~
- (a) Upon receiving an application for a change that requires prior approval, the competent authority shall verify the organisation's compliance with the applicable requirements before issuing the approval.
- (b) The competent authority shall prescribe the conditions under which the organisation may operate during the change unless the competent authority determines that the organisation's certificate needs to be suspended.
- (c) When satisfied that the organisation is in compliance with the applicable requirements, the competent authority shall approve the change.
- (d) Without prejudice to any additional enforcement measures, when the organisation implements changes requiring prior approval without having received competent authority approval as defined in (c), the competent authority shall suspend, limit, or revoke the organisation's certificate.
- (e) For changes not requiring prior approval, the competent authority shall assess the information provided in the notification sent by the organisation in accordance with M.A.713(c) to verify compliance with the applicable requirements. In case of any non-compliance, the competent authority shall:
- (1) notify the organisation about the non-compliance and request further changes; and
  - (2) in case of level 1 or level 2 findings, act in accordance with M.B.705 'Findings'.

**AMC1 M.B.706 Changes**

1. ~~Changes in nominated persons. The competent authority should have adequate control over any changes to the personnel specified in M.A.706 (a), (c), (d) and (i). Such changes will require an amendment to the exposition.~~
2. ~~It is recommended that a simple exposition status sheet is maintained which contains information on when an amendment was received by the competent authority and when it was approved.~~
3. ~~The competent authority should define the minor amendments to the exposition which may be incorporated through indirect approval. In this case a procedure should be stated in the amendment section of the approved continuing airworthiness management exposition.~~

~~Changes notified in accordance with M.A.713 are not considered minor. For all cases other than minor, the applicable part(s) of the EASA Form 13 should be used for the change.~~

4. ~~The approved continuing airworthiness management organisation should submit each exposition amendment to the competent authority whether it be an amendment for competent authority approval or an indirectly approved amendment. Where the amendment requires competent authority approval, the competent authority when satisfied, should indicate its approval in writing. Where the amendment has been submitted under the indirect approval procedure the competent authority should acknowledge receipt in writing.~~
  - (a) The competent authority should have adequate control over any changes to the management personnel specified in M.A.706 (a), (c), (d) and (i). Such changes in management personnel will require an amendment to the maintenance organisation exposition.
  - (b) When an organisation submits the name of a new nominee for any of the management personnel specified in M.A.706 (a), (c), (d) and (i), the competent authority may require the organisation to produce a written résumé of the proposed person's qualifications, in addition to the EASA Form 4 to be provided, as applicable. The competent authority should reserve the right to interview the nominee or call for additional evidence of his/her suitability before deciding upon his/her acceptability.
  - (c) For changes requiring prior approval, in order to verify the organisation's compliance with the applicable requirements, the competent authority should conduct an audit of the organisation, limited to the extent of the changes and determine the need for a safety risk assessment to be provided by the organisation. If a safety risk assessment is deemed necessary, the competent authority should inform the organisation accordingly. If required for verification, the audit should include interviews and inspections carried out at the organisation's facilities. If requested, the competent authority should assess the results of the safety risk assessment provided by the organisation.
  - (d) The applicable part(s) of the EASA Form 13 should be used to document the assessment of changes to the Part-M Subpart F approval.

**GM1 M.B.706 Changes****CHANGE OF NAME OF THE ORGANISATION**

- (a) On receipt of the application and the amendment to the relevant parts of the maintenance organisation exposition, the competent authority should reissue the certificate.
- (b) A name change alone does not require the competent authority to audit the organisation unless there is evidence that other aspects of the organisation have changed.

**M.B.707 ~~Revocation, suspension and limitation of an approval~~ Suspension, limitation and revocation**

The competent authority shall:

- (a) suspend an approval on reasonable grounds in the case of potential safety threat;
- (b) suspend, revoke or limit an approval pursuant to M.B.705; or
- (c) suspend an approval in case the competent authority's inspectors are unable over a period of 24 months to discharge their oversight responsibilities through on-site audit(s) due to the security situation in the State where the maintenance facilities are located.

**AMC1 M.B.707(c) Suspension, limitation and revocation**

- (a) The European Commission Security Directorate would generally advise against any, but essential, travel to a country where hostile conditions, or a combination of such make security precarious, and pose a high level of threat to personnel, as follows:
  - (1) international or internal armed conflict with frequent armed confrontation taking place, numerous casualties, and/or serious damages to infrastructures;
  - (2) situation of pre-war, or characterised by high internal or external tensions that could escalate into instability in the short term; very poorly functioning institutions;
  - (3) relatively frequent terrorist attacks due to the presence of active terrorist groups, either domestic or transnational, and state authorities' inability to ensure a satisfactory level of security; and
  - (4) frequent criminal violence targeting also non-nationals. State authorities possess limited ability to counter criminal activities and ensure security.
- (b) Countries falling under the provisions above should be considered as not compatible with the performance of on-site audit by the competent authority.

## SUBPART I — AIRWORTHINESS REVIEW CERTIFICATE

### **M.B.904 Exchange of information**

Upon receipt of a notification of aircraft transfer within the EU according to M.A.903, the competent authority shall inform the competent authority where the aircraft will be registered of any known problems with the aircraft being transferred. Furthermore, the competent authority where the aircraft will be registered, shall ensure that the former competent authority has been properly notified that the aircraft is leaving.

## Appendix VI: Continuing Airworthiness Management Organisation Approval referred to in Annex I (Part-M) Subpart G

[MEMBER STATE\*]

A Member of the European Union \*\*

### CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION APPROVAL CERTIFICATE

Reference: [MEMBER STATE CODE \*].MG.XXXX (ref. AOC XX.XXXX)

Pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council and to Commission Regulation (EC) No 2042/2003 for the time being in force and subject to the condition specified below, the [COMPETENT AUTHORITY OF THE MEMBER STATE \*] hereby certifies:

[COMPANY NAME AND ADDRESS]

as a continuing airworthiness management organisation in compliance with Section A, Subpart G of Annex I (Part-M) of Regulation (EC) No 2042/2003, approved to manage the continuing airworthiness of the aircraft listed in the attached schedule of approval and, when stipulated, to issue recommendations and airworthiness review certificates after an airworthiness review as specified in point M.A.710 of Annex I (Part-M), and, when stipulated, to issue permits to fly as specified in point M.A.711(c) of Annex I (Part-M) of the same regulation.

#### CONDITIONS

1. This approval is limited to that specified in the scope of approval section of the approved continuing airworthiness management exposition as referred to in Section A, Subpart G of Annex I (Part-M) of Regulation (EC) No 2042/2003.
2. This approval requires compliance with the procedures specified in the Annex I (Part-M) to Regulation (EC) No 2042/2003 approved continuing airworthiness management exposition.
3. This approval is valid whilst the approved continuing airworthiness management organisation remains in compliance with Annex I (Part-M) to Regulation (EC) No 2042/2003.
4. Where the continuing airworthiness management organisation contracts under its Quality Management System the service of an/several organisation(s), this approval remains valid subject to such organisation(s) fulfilling applicable contractual obligations.
5. Subject to compliance with the conditions 1 to 4 above, this approval shall remain valid for an unlimited duration unless the approval has previously been surrendered, superseded, suspended or revoked.

If this form is also used for AOC holders, the AOC number shall be added to the reference, in addition to the standard number, and the condition 5 shall be replaced by the following extra conditions:

6. This approval does not constitute an authorisation to operate the types of aircraft referred in paragraph 1. The authorisation to operate the aircraft is the Air Operator Certificate (AOC).

7. Termination, suspension or revocation of the AOC automatically invalidates the present approval in relation to the aircraft registrations specified in the AOC, unless otherwise explicitly stated by the competent authority.

8. Subject to compliance with the previous conditions, this approval shall remain valid for an unlimited duration unless the approval has previously been surrendered, superseded, suspended or revoked.

.

Date of original issue: .....

Signed: .....

Date of this revision: .....Revision No: .....

For the Competent Authority: [COMPETENT AUTHORITY OF THE MEMBER STATE \*]

Page ... of ...

.\* or EASA if EASA is the competent

**CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION  
APPROVAL SCHEDULE**

Reference: [MEMBER STATE CODE \*].MG.XXXX  
(ref. AOC XX.XXXX)

Organisation: [COMPANY NAME AND ADDRESS]

Aircraft type/series/group	Airworthiness review authorised	Permits to fly authorised	Organisation(s) working under <del>quality system</del> management system
	[YES / NO] ***	[YES / NO] ***	
	[YES / NO] ***	[YES / NO] ***	
	[YES / NO] ***	[YES / NO] ***	

	[YES / NO] ***	[YES / NO] ***	
<p>This approval schedule is limited to that specified in the scope of approval contained in the approved Continuing Airworthiness Management Exposition section .....</p> <p>Continuing Airworthiness Management Exposition Reference: .....</p> <p>Date of original issue: .....</p> <p>Signed: .....</p> <p>Date of this revision: ..... Revision No: .....</p> <p>For the Competent Authority: [COMPETENT AUTHORITY OF THE MEMBER STATE *]</p>			

EASA Form 14 Issue 4

\* or EASA if EASA is the competent authority

\*\* Delete for non-EU Member State or EASA

\*\*\* Delete as appropriate if the organisation is not approved."

**Appendix II to M.A. 201 (h) 1 : Subcontracting of continuing airworthiness management tasks**

Items 2. 6 and 2.17 are amended as below:

.....

**2.6 ~~Quality~~ Compliance monitoring and risk assessment**

The operator's ~~quality~~ management system should monitor the adequacy of the subcontracted continuing airworthiness management task performance for compliance with the contract and M.A Subpart G and assess the risks entailed by such subcontracting. The terms of the contract should therefore include a provision allowing the operator to perform a ~~quality~~ surveillance (including audits and assessments) upon the subcontracted organisation. The aim of the surveillance is primarily to investigate and judge the effectiveness of those subcontracted activities and thereby to ensure compliance with M.A Subpart G and the contract and mitigate safety risks. Audit reports may be subject to review when requested by the competent authority.

.....

**2.17 Communication between the operator and subcontracted organisation**

2.17.1 To exercise airworthiness responsibility the operator needs to be in receipt of all relevant reports and relevant maintenance data. The contract should specify what information should be provided and when.

2.17.2 Meetings provide one important corner stone whereby the operator can exercise part of its responsibility for ensuring the airworthiness of the operated aircraft. They should be used to establish good communications between the operator, the subcontracted organisation and, where different to the foregoing, the contracted Part-145 organisation. The terms of contract should include whenever appropriate the provision for a certain number of meetings to be held between involved parties. Details of the types of liaison meetings and associated terms of reference of each meeting should be documented. The meetings may include but are not limited to all or a combination of:

A – Contract review

Before the contract is applicable, it is very important that the technical personnel of both parties that are involved in the application of the contract meet in order to be sure that every point leads to a common understanding of the duties of both parties.

B – Work scope planning meeting

Work scope planning meetings may be organised so that the tasks to be performed may be commonly agreed.

C – Technical meeting

Scheduled meetings should be organised in order to review on a regular basis and agree actions on technical matters such as ADs, SBs, future modifications, major defects found during shop visit, reliability, etc.

D – ~~Quality~~ Compliance and performance meeting

~~Quality~~ Compliance and performance meetings should be organised in order to examine matters raised by the operator's ~~quality~~ surveillance and the competent authority's ~~oversight~~ ~~monitoring~~—activity and to agree upon necessary ~~preventive and~~ corrective actions.

E – Reliability meeting

When a reliability programme exists, the contract should specify the operator's and Part-145 approved organisation's respective involvement in that programme, including the participation to reliability meetings. Provision to enable the competent authority participation in the periodical reliability meetings should also be provided.



**Appendix V to AMC1 M.A.704 Continuing airworthiness management exposition****CONTINUING AIRWORTHINESS MANAGEMENT EXPOSITION****TABLE OF CONTENTS****Part 0 General organisation**

- 0.1 Corporate commitment by the accountable manager.
- 0.2 General information.
- 0.3 Management personnel.
- 0.4 Management organisation chart.
- 0.5 Notification procedure to the competent authority regarding changes to the organisation's activities / approval / location / personnel.
- 0.6 Exposition amendment procedures.
- 0.7 **Alternative means of compliance procedure**

**Part 1 Continuing airworthiness management procedures**

- 1.1 Aircraft technical log utilisation and MEL application (commercial air transport).  
Aircraft continuing airworthiness record system utilisation (non-commercial air transport).
- 1.2 Aircraft maintenance programmes – development amendment and approval.
- 1.3 Time and continuing airworthiness records, responsibilities, retention, access.
- 1.4 Accomplishment and control of airworthiness directives.
- 1.5 Analysis of the effectiveness of the maintenance programme(s).
- 1.6 Non-mandatory modification embodiment policy.
- 1.7 Major modification standards.
- 1.8 Defect reports.
- 1.9 Engineering activity.
- 1.10 Reliability programmes.
- 1.11 Pre-flight inspections.
- 1.12 Aircraft weighing.
- 1.13 Check flight procedures.

**Part 2 ~~Quality Management~~ system ~~procedures~~**

- 2.1 Continuing airworthiness ~~safety~~ ~~quality~~ policy, ~~compliance monitoring~~ plan and audits procedure.

- 2.2 Monitoring of continuing airworthiness management activities.
- 2.3 Monitoring of the effectiveness of the maintenance programme(s).
- 2.4 Monitoring that all maintenance is carried out by an appropriate maintenance organisation
- 2.5 Monitoring that all contracted maintenance is carried out in accordance with the contract, including subcontractors used by the maintenance contractor.
- 2.6 Compliance monitoring ~~Quality audit~~ personnel.
- 2.7 Hazard identification and safety risk management schemes.
- 2.8 Safety action planning.
- 2.9 Safety performance monitoring.
- 2.10 Incident investigation and safety reporting.
- 2.11 Emergency response planning.
- 2.12 Management of change (including organisational changes with regard to safety responsibilities).
- 2.13 Safety promotion.
- 2.14 Management system record keeping

### **Part 3 Contracted Maintenance**

- 3.1 Maintenance contractor selection procedure.
- 3.2 ~~Quality Audit~~ of aircraft.

### **Part 4 Airworthiness review procedures**

- 4.1 Airworthiness review staff.
- 4.2 Review of aircraft records.
- 4.3 Physical survey.
- 4.4 Additional procedures for recommendations to competent authorities for the import of aircraft.
- 4.5 Recommendations to competent authorities for the issue of ARC.
- 4.6 Issue~~ance~~ of ARC.
- 4.7 Airworthiness review records, responsibilities, retention and access.

### **Part 4B Permit to fly procedures**

- 4B.1 Conformity with approved flight conditions;
- 4B.2 Issue of the permit to fly under the CAMO privilege;
- 4B.3 Permit to fly authorised signatories;

- 4B.4 Interface with the local authority for the flight;
- 4B.5 Permit to fly records, responsibilities, retention and access.

**Part 5** ~~Appendices~~ **Supporting documents**

- 5.1 Sample documents;
- 5.2 List of airworthiness review staff;
- 5.3 List of subcontractors as per AMC M.A.201(h) 1 and M.A.711(a)3;
- 5.4 List of approved maintenance organisations contracted;
- 5.5 Copy of contracts for subcontracted work (Appendix II to AMC M.A.201(h) 1)
- 5.6 Copy of contracts with approved maintenance organisations.”

**LIST OF EFFECTIVE PAGES**

Page	Revision
1	Original
2	Original

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3	Original
4	Original

Page	Revision
5	Original
....	....

**DISTRIBUTION LIST**

*(The document should include a distribution list to ensure proper distribution of the manual and to demonstrate to the competent authority that all personnel involved in continuing airworthiness has access to the relevant information. This does not mean that all personnel have to be in receipt of a manual but that a reasonable amount of manuals are distributed within the organisation(s) so that the concerned personnel may have quick and easy access to this manual.*

*Accordingly, the continuing airworthiness management exposition should be distributed to:*

- *the operator's or the organisation's management personnel and any person at a lower level as necessary; and,*
- *the Part-145 or M.A. Subpart F contracted maintenance organisation(s) ; and,*
- *the competent authority.)*

## PART 0 GENERAL ORGANISATION

### 0.1 Corporate commitment by the accountable manager

*(The accountable manager's exposition statement should embrace the intent of the following paragraph and in fact this statement may be used without amendment. Any modification to the statement should not alter the intent.)*

This exposition defines the organisation and procedures upon which the M.A. Subpart G approval of Joe Bloggs under Part-M is based.

These procedures are approved by the undersigned and must be complied with, as applicable; in order to ensure that all the continuing airworthiness activities including maintenance for aircraft managed by Joe Bloggs is carried out on time to an approved standard.

It is accepted that these procedures do not override the necessity of complying with any new or amended regulation published by the Agency or the competent authority from time to time where these new or amended regulations are in conflict with these procedures.

~~The competent authority will approve this organisation whilst the competent authority is satisfied that the procedures are being followed. It is understood that the competent authority reserves the right to suspend, vary or revoke the M.A. Subpart G continuing airworthiness management approval of the organisation, as applicable, if the competent authority has evidence that the procedures are not followed and the standards not upheld.~~

The competent authority will approve this organisation when satisfied that the procedures are in compliance with Part-M. The approval remains valid subject to compliance with Part-M and the organisation's procedures. It is understood that the competent authority reserves the right to limit, suspend, or revoke the approval of the organisation, as applicable, if the competent authority has evidence that the procedures are not followed and compliance with Part-M is not demonstrated.

In the case of commercial air transport, suspension or revocation of the approval of the Part M Subpart G continuing airworthiness management approval ~~would~~ **will** invalidate the AOC.

### 0.2 General Information

#### a) Brief description of the organisation

*(This paragraph should describe broadly how the whole organisation [i.e. including the whole operator in the case of commercial air transport or the whole organisation when other approvals are held] is organised under the management of the accountable manager, and should refer to the organisation charts of paragraph 0.4.)*

#### b) Relationship with other organisations

*(This paragraph may not be applicable to every organisation.)*

#### **(1) Subsidiaries/mother company**

*(For clarity purpose, where the organisation belongs to a group, this paragraph should explain the specific relationship the organisation may have with other members of that group - e.g. links between Joe Bloggs Airlines, Joe Bloggs Finance, Joe Bloggs Leasing, Joe Bloggs Maintenance, etc.)*

## **(2) Consortiums**

*(Where the organisation belongs to a consortium, it should be indicated here. The other members of the consortium should be specified, as well as the scope of organisation of the consortium [e.g. operations, maintenance, design (modifications and repairs), production etc.]. The reason for specifying this is that consortium maintenance may be controlled through specific contracts and through consortium's policy and/or procedures manuals that might unintentionally override the maintenance contracts. In addition, in respect of international consortiums, the respective competent authorities should be consulted and their agreement to the arrangement clearly stated. This paragraph should then make reference to any consortium's continuing airworthiness related manual or procedure and to any competent authority agreement that would apply.)*

### C) Aircraft managed – Fleet composition

*(This paragraph should quote the aircraft types and the number of aircraft of each type. The following is given as an example :)*

Joe Bloggs PLC manages, as of 28 November 2003, the following:

- . 3 B737-300
- . 3 B737-400
- . 1 A 320-200
- . 14 F27 (MK500), etc.

For commercial air transport, the fleet composition reference with the aircraft registrations is given by Joe Bloggs Airlines' current AOC (or elsewhere e.g. in the Operation Manual, by agreement of the competent authority)

*(Depending on the number of aircraft, this paragraph may be updated as follows:*

- 1) the paragraph is revised each time an aircraft is removed from or added in the list.*
- 2) the paragraph is revised each time a type of aircraft or a significant number of aircraft is removed from or added to the list. In that case the paragraph should explain where the current list of aircraft managed is available for consultation.)*

### d) Type of operation

*(This paragraph should give broad information on the type of operations such as: commercial, aerial work, non-commercial, long haul/short haul/regional, scheduled/charter, regions/countries/continents flown, etc.)*

## **0.3 Management personnel**

### Accountable manager

*(This paragraph should address the duties and responsibilities of the accountable manager as far as Part M.A. subpart G is concerned and demonstrate that he/she has corporate authority for ensuring that all continuing airworthiness activities can be financed and carried out to the required standard. It should also make reference to the direct safety accountability of the accountable manager.)*

b) Nominated post holder for continuing airworthiness (for commercial air transport)

(This paragraph should:

- Emphasise that the nominated post holder for continuing airworthiness is responsible to ensure that all maintenance is carried out on time to an approved standard.
- Describe the extent of his authority as regards his Part M responsibility for continuing airworthiness.

This paragraph is not necessary for organisations not holding an AOC)

c) Continuing airworthiness coordination

(This paragraph should list the job functions that constitute the "group of persons" as required by M.A.706(c) in enough detail so as to show that all the continuing airworthiness responsibilities as described in Part-M are covered by the persons that constitute that group. In the case of small operators, where the "Nominated Post holder for continuing airworthiness constitutes himself/herself the "group of persons", this paragraph may be merged with the previous one.)

d) Duties and responsibilities

(This paragraph should further develop the duties and responsibilities of:

- the personnel listed in paragraphs c): "Continuing airworthiness coordination ",
- the safety manager, as regards safety management related processes and tasks,
- the quality compliance monitoring-manager, as regards the quality compliance monitoring of the maintenance system [which includes the approved maintenance organisation(s)]

e) Manpower resources and training policy

**(1) Manpower resources**

(This paragraph should give broad figures to show that the number of people-staff dedicated to the performance of the approved continuing airworthiness activity is adequate. It is not necessary to give the detailed number of employees of the whole company but only the number of those involved in continuing airworthiness. This could be presented as follows:)

As of 28 November 2003-2012 , the number of employees dedicated to the performance of the continuing airworthiness management system is the following:

	Full Time	Part Time in equivalent full time
Quality Compliance monitoring	AA	aa = AA'
Continuing airworthiness management	BB	bb = BB'
(Detailed information about the management group of persons) , including safety manager	BB1	bb1 = BB1'
	BB2	bb2 = BB2'
Other...	CC	cc =CC'

Total	TT	tt = TT'
Total Man hours	TT + TT'	

*(Note: According to the size and complexity of the organisation, this table may be further developed or simplified)*

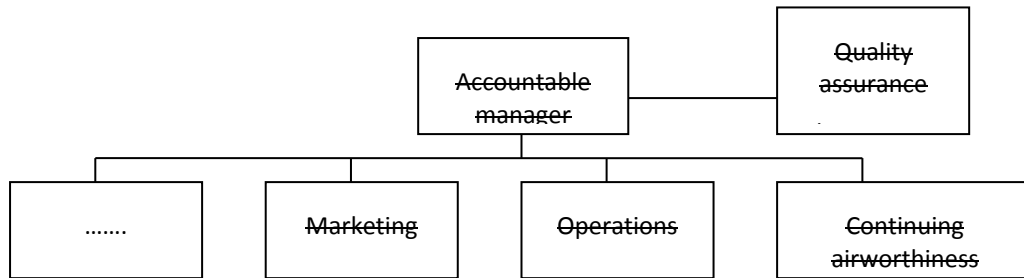
**(2) Training policy**

*(This paragraph should show that the training and qualification standards for the personnel quoted above are consistent with the size and complexity of the organisation. It should also explain how the need for recurrent training is assessed and how the training recording and follow-up is performed)*

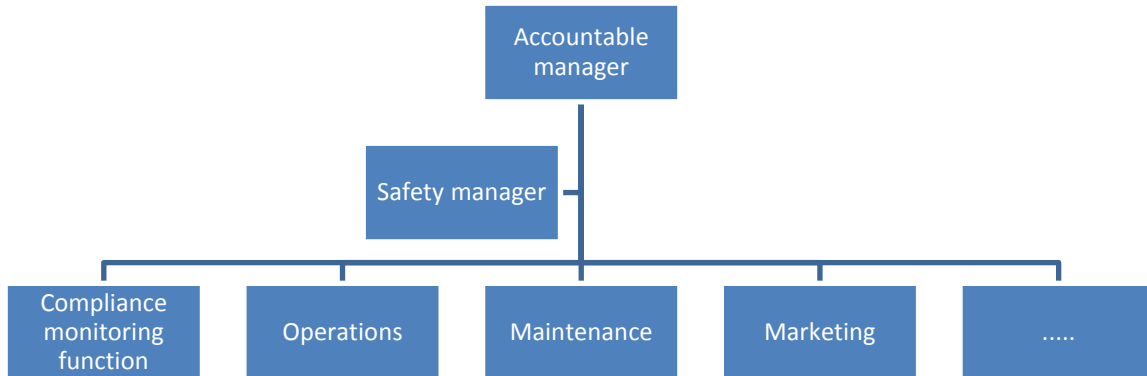
**0.4 Management organisation charts**

**a) General organisation chart**

*This flow chart should provide a comprehensive understanding of the whole company's organisation. For example in the case of an AOC holder:*

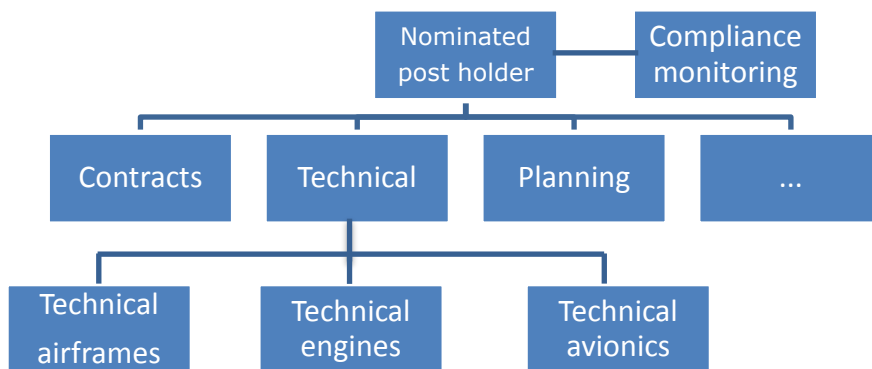






**b) Continuing airworthiness management organisation chart**

*This flow chart should give further details on the continuing airworthiness Management system, and should clearly show the independence of the ~~quality compliance monitoring system~~, including the links between the ~~compliance monitoring function~~ ~~quality assurance department~~ and the other departments (see example below). This flow chart may be combined with the one above or subdivided as necessary, depending on the size and the complexity of the organisation. For example in the case of an AOC holder:*



**0.5 Notification procedure to the competent authority regarding changes to the organisation's activities / approval / location / personnel**

*(This paragraph should explain in which occasion the company should inform the competent authority prior to incorporating proposed changes; for instance:*

*The accountable manager (or any delegated person such as the engineering director or the ~~quality~~ compliance monitoring) will notify to the competent authority any change concerning:*

- (1) the company's name and location(s)*
- (2) the group of person as specified in paragraph 0.3.c)*
- (3) operations, procedures and technical arrangements, as far as they may affect the approval.*

*Joe Bloggs will not incorporate such change until the change have been assessed and approved by the competent authority.)*

**0.6 Exposition amendment procedure**

*(This paragraph should explain who is responsible for the amendment of the exposition and submission to the competent authority for approval. This may include, if approved agreed by the competent authority the possibility for the ~~approved~~ organisation to incorporate certain changes without prior competent authority approval subject to the conditions specified in the exposition ~~approve internally minor changes that have no impact on the approval held~~. The paragraph should then specify ~~what types of changes are considered as minor and major and the scope of changes not requiring prior competent authority approval~~—~~what as well as the procedures to manage such changes~~—~~the approval procedures for both cases are~~.)*

**0.7 Alternative means of compliance procedure**

*(This paragraph should explain who is responsible for requesting approval of alternative means of compliance and providing the supporting documentation and how the risk assessment is performed as required to demonstrate compliance (cf. AMC1 M.A.720)).*

## **PART 1 CONTINUING AIRWORTHINESS MANAGEMENT PROCEDURES**

### **1.1 Aircraft technical log utilisation and MEL application**

**or**

### **1.1 Aircraft continuing airworthiness record system utilisation**

a) Aircraft technical log and/or continuing airworthiness record system

#### **(1) General**

*(It may be useful to remind, in this introduction paragraph, the purpose of the aircraft technical log system and/or continuing airworthiness record system, with special care to the options of M.A.305 and M.A.306 For that purpose, paragraphs of M.A.305 and M.A.306 may be quoted or further explained.)*

#### **(2) Instructions for use**

*(This paragraph should provide instructions for using the aircraft technical log and/or continuing airworthiness record system. It should insist on the respective responsibilities of the maintenance personnel and operating crew. Samples of the technical log and/or continuing airworthiness record system should be included in Part 5 "Appendices" in order to provide enough detailed instructions.)*

#### **(3) Aircraft technical log approval**

*(This paragraph should explain who is responsible for submitting the aircraft technical log any subsequent amendment to the competent authority for approval and what is the procedure to be followed).*

b) M.E.L. application

*(Although the MEL is a document that is normally not controlled by the continuing airworthiness management system, and that the decision of whether accepting or not a MEL tolerance normally remains the responsibility of the operating crew, this paragraph should explain in sufficient detail the MEL application procedure, because the MEL is a tool that the personnel involved in maintenance have to be familiar with in order to ensure proper and efficient communication with the crew in case of a defect rectification to be deferred.)*

*(This paragraph does not apply to those types of aircraft that do not have an MEL or are not used for commercial air transport and that are not required to have one.)*

#### **(1) General**

*(This paragraph should explain broadly what a MEL document is. The information could be extracted from the aircraft flight manual.)*

#### **(2) MEL categories**

*(Where an owner/operator uses a classification system placing a time constraint on the rectification of such defect, it should be explained here what are the general principles of such a system. It is essential for the personnel involved in maintenance to be familiar with it for the management of MEL's deferred defect rectification.)*

#### **(3) Application**

*(This paragraph should explain how the maintenance personnel identify a MEL limitation to*

the crew. This should refer to the technical log procedures)

#### **(4) Acceptance by the flight crew (For commercial air transport)**

(This paragraph should explain how the crew notifies ~~their~~ ~~his~~ acceptance or non-acceptance of the MEL deferment in the technical log)

#### **(5) Management of the MEL time limits**

(After a technical limitation is accepted by the crew, the defect must be rectified within the time limit specified in the MEL. There should be a system to ensure that the defect will actually be corrected before that limit. This system could be the aircraft technical log for those [small] operators that use it as a planning document, or a specific follow-up system, in other cases, where control of the maintenance time limit is ensured by another means such as data processed planning systems.)

#### **(6) MEL Time Limitation Overrun**

(The competent authority may grant the owner/operator to overrun MEL time limitation under specified conditions. Where applicable this paragraph should describe the specific duties and responsibilities for controlling these extensions.)

### **1.2 Aircraft maintenance programmes – generic/baseline maintenance programmes development and amendment**

#### a) General

(This introductory paragraph should remind that the purpose of a maintenance programme is to provide maintenance planning instructions necessary for the safe operation of the aircraft.)

#### b) Content

(This paragraph should explain what is [are] the format[s] of the ~~company's~~ aircraft maintenance programme[s]. Appendix I to AMC M.A.302 (a) and M.B.301 (d) should be used as a guideline to develop this paragraph.)

#### c) Development

#### **(1) Sources**

(This paragraph should explain what are the sources [MRB, MPD, Maintenance Manual, etc.] used for the development of an aircraft maintenance programme.)

#### **(2) Responsibilities**

(This paragraph should explain who is responsible for the development of an aircraft maintenance programme)

#### **(3) Manual Maintenance programme amendments**

(This paragraph should demonstrate that there is a system for ensuring the continuing validity of the aircraft maintenance programme. Particularly, it should show how any relevant information is used to update the aircraft maintenance programme. This should include, as applicable, MRB report revisions, consequences of modifications, manufacturers and competent authority recommendations, in service experience, and reliability reports.)

#### **(4) ~~Acceptance by the authority~~ Approval procedures**

(This paragraph should explain who is responsible for the submission of the maintenance programme to the competent authority and what the procedure to follow is. This should in

*particular address the issue of the competent authority approval for variation to maintenance intervals periods. This may include, if ~~agreed~~ approved by the competent authority the possibility for the approved organisation to approve internally itself certain changes. The paragraph should then specify what types of changes are concerned and what the approval procedures are.)*

### **1.3 Time and continuing airworthiness records, responsibilities, retention, access**

#### a) Hours and cycles recording

*(The recording of flight hours and cycles is essential for the planning of maintenance tasks. This paragraph should explain how the continuing airworthiness management organisation has access to the current flight hours and cycle information and how it is processed through the organisation.)*

#### b) Records

*(This paragraph should give in detail the type of company documents that are required to be recorded and what are the recording period requirements for each of them. This can be provided by a table or series of tables that would include the following:*

- Family of document [if necessary],*
- Name of document,*
- Retention period,*
- Responsible person for retention,*
- Place of retention,)*

#### c) Preservation of records

*(This paragraph should set out the means provided to protect the records from fire, floods, etc. as well as the specific procedures in place to guarantee that the records will not be altered during the retention period [especially for the computer record].)*

#### d) Transfer of continuing airworthiness records

*(This paragraph should set out the procedure for the transfer of records, in case of purchase/lease-in, sale/lease-out and transfer to another organisation of an aircraft. In particular, it should specify which records have to be transferred and who is responsible for the coordination [if necessary] of the transfer.)*

### **1.4 Accomplishment and control of Airworthiness Directives**

*(This paragraph should demonstrate that there is a comprehensive system for the management of airworthiness directives. This paragraph may for instance include the following Sub-paragraphs:)*

#### a) Airworthiness directive information

*(This paragraph should explain what the AD information sources are and who receives them in the company. Where available, redundant sources [e.g. agency+ competent authority + manufacturer or association] may be useful.)*

#### b) Airworthiness directive decision

*(This paragraph should explain how and by whom the AD information is analysed and what kind of information is provided to the contracted maintenance organisations in order to plan and to perform the airworthiness directive. This should as necessary include a specific procedure for emergency airworthiness directive management)*

#### c) Airworthiness directive control

*(This paragraph should specify how the organisation manages to ensure that all the applicable airworthiness directives are performed and that they are performed on time. This should include a close loop system that allows verifying that for each new or revised*

*airworthiness directive and for each aircraft:*

- *the AD is not applicable or,*
- *if the AD is applicable:*
  - *the Airworthiness Directive is not yet performed but the time limit is not overdue,*
  - *the Airworthiness Directive is performed, and any repetitive inspection are identified and performed.*

*This may be a continuous process or may be based on scheduled reviews.)*

### **1.5 Analysis of the effectiveness of the maintenance programme**

*(this paragraph should show what tools are used in order to analyse the efficiency of the maintenance programme, such as:*

- *PIREPS,*
- *air turn-backs*
- *spare consumption,*
- *repetitive technical occurrence and defect,*
- *technical delays analysis [through statistics if relevant],*
- *technical incidents analysis [through statistics if relevant],*
- *etc.*

*The paragraph should also indicate by whom and how these data are analysed, what is the decision process to take action and what kind of action could be taken. This may include:*

- *amendment of the maintenance programme,*
- *amendment of maintenance or operational procedures,*
- *etc.)*

### **1.6 Non-mandatory modification embodiment policy**

*(This paragraph should specify how the non-mandatory modification information are processed through the organisation, who is responsible for their assessment against the operator's/owner's own need and operational experience, what are the main criteria for decision and who takes the decision of implementing [or not] a non-mandatory modification)*

### **1.7 Major repair modification standards**

*(This paragraph should set out a procedure for the assessment of the approval status of any major modification before embodiment. This will include the assessment of the need of an Agency or design organisation approval. It should also identify the type of approval required, and the procedure to follow to have a modification approved by the Agency or design organisation.)*

### 1.8 Defect reports

#### a) Analysis

*(This paragraph should explain how the defect reports provided by the contracted maintenance organisations are processed by the continuing airworthiness management organisation. Analysis should be conducted in order to give elements to activities such as ~~maintenance programme evolution and non-mandatory modification policy~~ the analysis of the effectiveness of the maintenance programme and the non-mandatory modification embodiment policy.)*

#### b) Liaison with ~~design approval holders~~ manufacturers and regulatory authorities

*(Where a defect report shows that such defect is likely to occur to other aircraft, a liaison should be established with the ~~design approval holder~~ manufacturer and the certification competent authority, so that they may take all the necessary action.)*

#### c) Deferred defect policy

*(Defects such as cracks and structural defect are not addressed in the MEL and CDL. However, it may be necessary in certain cases to defer the rectification of a defect. This paragraph should establish the procedure to be followed in order to be sure that the deferment of any defect will not lead to any safety concern. This will include appropriate liaison with the ~~type certificate holder~~ manufacturer.)*

### 1.9 Engineering activity

*(Where applicable, this paragraph should expose ~~how the organisation manages activities related to the scope of the organisation's engineering activity in terms of approval of modification and repairs. It should set out a procedure for developing and submitting a modification/repair design for approval to the Agency and include reference to the supporting documentation and forms used. It should identify the person in charge of accepting the design before submission to the Agency or the competent authority.~~*

*Where the organisation has a DOA capability under Part-21, it should be indicated here and the related manuals should be referred to.)*

### 1.10 Reliability programmes

*(This paragraph should explain appropriately the management of a reliability programme. It should at least address the following:*

- extent and scope of the operator's reliability programmes,*
- specific organisational structure, duties and responsibilities,*
- establishment of reliability data,*
- analysis of the reliability data,*
- corrective action system (maintenance programme amendment),*
- scheduled reviews (reliability meetings, the participation of the competent authority.)*

*(This paragraph may be, where necessary, subdivided as follows:)*

#### a) Airframe

#### b) Propulsion

#### c) Component

### **1.11 Pre-flight inspections**

*(This paragraph should show how the scope and definition of pre-flight inspection, that are usually performed by the operating crew, is kept consistent with the scope of the maintenance performed by the contracted maintenance organisations. It should show how the evolution of the pre-flight inspection content and the maintenance programme are concurrent, each time necessary.)*

*(The following paragraphs are self-explanatory. Although these activities are normally not performed by continuing airworthiness personnel, these paragraphs have been placed here in order to ensure that the related procedures are consistent with the continuing airworthiness activity procedures.)*

- a) Preparation of aircraft for flight
- b) Subcontracted ground handling function
- c) Security of Cargo and Baggage loading
- d) Control of refueling, Quantity/Quality
- e) Control of snow, ice, residues from de-icing or anti-icing operations, dust and sand contamination to an approved standard

### **1.12 Aircraft weighing**

*(This paragraph should state in which occasion an aircraft has to be weighed [for instance after a major modification because of weight and balance operational requirements, etc.] who performs it, according to which procedure, who calculates the new weight and balance and how the result is processed into the organisation.)*

### **1.13 Check flight procedures**

*(The criteria for performing a check flight are normally included in the aircraft maintenance programme. This paragraph should explain how the check flight procedure is established in order to meet its intended purpose [for instance after a heavy maintenance check, after engine or flight control removal installation, etc.], and the release procedures to authorise such a check flight.)*



## PART 2 ~~QUALITY~~ MANAGEMENT SYSTEM

### 2.1 Continuing airworthiness ~~quality~~ safety policy, audit plan and audits procedure

a) Continuing airworthiness ~~quality~~ safety policy

*(This paragraph should include a formal ~~Quality~~ Safety Policy statement; that is a commitment on what the ~~Quality Management System~~ is intended to achieve. It should include at the minimum ~~monitoring compliance with Part M and any additional standards specified by the organisation~~ the elements defined in AMC1 M.A.712(a)(2)).*

b) ~~Quality~~ Compliance monitoring planning

*(This paragraph should show how the ~~quality~~ audit plan is established. The ~~quality~~ audit plan will consist of an ~~quality~~ audit and sampling schedule that should cover all the areas specific to Part M in a definite period of time. However, the scheduling process should also be dynamic and consider the results of the hazard identification and safety risk assessment processes allow for special evaluations when trends or concerns are identified. In case of subcontracting, this paragraph should also address the planning of the auditing of subcontractors at the same frequency as the rest of the organisation.)*

c) ~~Quality~~ audit procedure

*(The ~~quality~~ audit is a key element of the ~~quality~~ management system. Therefore, the ~~quality~~ audit procedure should be sufficiently detailed to address all the steps of an audit, from the preparation to the conclusion, show the audit report format [e.g. by ref. to paragraph 5.1 "sample of document"], and explain the rules for the distribution of audits reports in the organisation [e.g.: involvement of the ~~Quality~~ Compliance monitoring Manager, Accountable Manager, Nominated Postholder, etc.]*

d) ~~Quality~~ audit remedial Corrective action procedure

*(This paragraph should explain what system is put in place in order to ensure that the corrective actions are implemented on time and that the result of the corrective action meets the intended purpose. For instance, where this system consists in periodical corrective actions review, instructions should be given how such reviews should be conducted and what should be evaluated.)*

a) Hazard identification and safety risk management schemes

*(This paragraph should explain what system and procedures are put in place in order to ensure that safety risk management is implemented. This should address reactive and proactive hazard identification, and describe the risk assessment, evaluation, and management procedures of the organisation. The internal safety reporting scheme should also be described.*

b) Safety action planning

*(This paragraph should explain what system is put in place in order to ensure that actions determined in the context of safety risk management are properly planned and implemented.)*

c) Safety performance monitoring

*(This paragraph should explain what system and procedures are put in place in order to monitor the organisation's safety performance.)*

d) Incident investigation and occurrence reporting

(This paragraph should explain the responsibilities and procedures applicable to all investigations following on from internal and external occurrence reports.)

e) Emergency response planning

(This paragraph should describe how the organisation plans for emergencies and include a reference to the organisation's current ERP.)

f) Management of change (including organisational changes with regard to safety responsibilities)

(This paragraph should describe the organisation's procedures for the management of changes, cf. GM 3 M.A.712(a)(3).)

g) Safety promotion

(This paragraph should describe the provisions of the organisation to ensure safety promotion (methods and responsibilities, feedback mechanisms, etc.)).

h) Management system record keeping

(This paragraph should describe how the organisation ensures adequate records are kept for all management system key processes.)

## 2.2 Monitoring of continuing airworthiness management activities

*(This paragraph should set out a procedure to periodically review the activities of the ~~maintenance management~~ continuing airworthiness management personnel and how they fulfil their responsibilities, as defined in Part 0.)*

## 2.3 Monitoring of the effectiveness of the maintenance programme(s)

*(This paragraph should set out a procedure to periodically review that the effectiveness of the maintenance programme is actually analysed as defined in Part 1.)*

## 2.4 Monitoring that all maintenance is carried out by an appropriate maintenance organisation

*(This paragraph should set out a procedure to periodically review that the approval of the contracted maintenance organisations are relevant for the maintenance being performed on the operator's fleet. This may include feedback information from any contracted organisation on any actual or contemplated amendment, in order to ensure that the maintenance system remains valid and to anticipate any necessary change in the maintenance agreements.)*

*If necessary, the procedure may be subdivided as follows:*

- a) Aircraft maintenance
- b) Engines
- c) Components

## 2.5 Monitoring that all contracted maintenance is carried out in accordance with the contract, including subcontractors used by the maintenance contractor

*(This paragraph should set out a procedure to periodically review that the continuing airworthiness management personnel are satisfied that all contracted maintenance is carried out in accordance with the contract. This may include a procedure to ensure that the system allows all the personnel involved in the contract [including the contractors and his subcontractors] to be acquainted with its terms and that, for any contract amendment, relevant information is dispatched in the organisation and at the contractor.)*

## 2.6 ~~Quality audit~~ Compliance monitoring personnel

*(This paragraph should establish the required training and qualification standards of ~~auditors~~*

*compliance monitoring personnel. Where persons act as a part time auditor, it should be emphasized that this person must not be directly involved in the activity he/she audits.)*

## **2.7 Hazard identification and safety risk management schemes**

*(This paragraph should establish the means to identify safety hazards and describe the responsibilities, methods, tools and procedures used for the purpose of safety risk assessment, evaluation and mitigation. A reference to 2.10 should be made.)*

## **2.8 Safety action planning**

*(This paragraph should describe how the organisation derives safety actions from its hazard identification, safety reporting, and safety risk management processes and establish responsibilities for establishment and follow-up of the safety action plan).*

## **2.9 Safety performance monitoring**

*(This paragraph should describe how the organisation monitors and measures its safety performance against the safety policy and objectives, as detailed in AMC1 M.A.712(a)() point (d).)*

## **2.10 Incident investigation and safety reporting**

*(This paragraph should describe the responsibilities and procedures for the performance of internal investigations following incidents. It should also describe the organisation's internal safety reporting scheme and explain how information gathered through these processes feeds into hazard identification, safety risk management, and safety action planning.)*

## **2.11 Emergency response planning**

*(This paragraph should describe how the organisation plans for emergencies and establish responsibilities for preparing, implementing and maintaining the organisation's ERP. Where relevant, it should also describe the links between the organisation's ERP and the ERP of its customers, partners and contractors.)*

## **2.12 Management of change (including organisational changes with regard to safety responsibilities)**

*(This paragraph should describe how the organisation identifies hazards and manages risks stemming from a change. This may be based on the organisation's existing processes for hazard identification, safety risk management and safety action planning.)*

## **2.13 Safety promotion**

*(This paragraph should describe how the organisation ensures safety promotion, through training and communication on safety matters, in order to foster a positive safety culture.)*

## **2.14 Management system record keeping.**

*(This paragraph should define responsibilities and procedures for keeping records of all management system key processes, including location where the records are being stored and access to such records. This is required not only to provide evidence of their correct functioning, but also to effectively support hazard identification and risk management processes.)*

## **PART 3 CONTRACTED MAINTENANCE**

### **3.1 Maintenance contractor selection procedure**

*(This paragraph should explain how a maintenance contractor is selected by the continuing airworthiness management organisation. Selection should not be limited to the verification that the contractor is appropriately approved for the type of aircraft, but also that the contractor has the industrial capacity to undertake the required maintenance. This selection procedure should preferably include a contract review process in order to insure that:*

- the contract is comprehensive and that no gap or unclear area remains,*
- everyone involved in the contract (both at the continuing airworthiness management organisation and at the maintenance contractor) agrees with the terms of the contract and fully understand his responsibility.*
- that functional responsibilities of all parties are clearly identified.*
- is signed by the owner/lessee of the aircraft in the case of non-commercial air transport.*

*In the case of operations other than non commercial air transport, this activity should be carried in agreement with the owner.)*

### **3.2 Quality Product audit of aircraft**

*(This paragraph should set out the procedure when performing a quality a product audit of an aircraft. It should set out the differences between an airworthiness review and quality a product audit. This procedure may include:*

- compliance with approved procedures;*
- contracted maintenance is carried out in accordance with the contract;*
- continued compliance with Part M.)*

## **PART 4 AIRWORTHINESS REVIEW PROCEDURES**

### **4.1 Airworthiness review staff**

*(This paragraph should establish the working procedures for the assessment of the airworthiness review staff. The assessment addresses experience, qualification, training, etc. A description should be given regarding the issuance of authorisations for the airworthiness review staff and how records are kept and maintained.)*

### **4.2 Review of aircraft records**

*(This paragraph should describe in detail the aircraft records that are required to be reviewed during the airworthiness review. The level of detail that needs to be reviewed should be described and the number of records that need to be reviewed during a sample check.)*

### **4.3 Physical survey**

*(This paragraph should describe how the physical survey needs to be performed. It should list the topics that need to be reviewed, the physical areas of the aircraft to be inspected, which documents onboard the aircraft that need to be reviewed, etc. )*

### **4.4 Additional procedures for recommendations to competent authorities for the import of aircraft**

*(This paragraph should describe the additional tasks regarding the recommendation for the issuance of an airworthiness review certificate in the case of an import of an aircraft. This should include: communication with the competent authority of registry, additional items to be reviewed during the airworthiness review of the aircraft, specification of maintenance required to be carried out, etc.)*

### **4.5 Recommendations to competent authorities for the issue of airworthiness review certificates**

*(This paragraph should stipulate the communication procedures with the competent authorities in case of a recommendation for the issuance of an airworthiness review certificate. In addition, the content of the recommendation should be described.)*

### **4.6 Issuance of airworthiness review certificates**

*(This paragraph should set out the procedures for the issuance of the ARC. It should address record keeping, distribution of the ARC copies, etc. This procedure should ensure that only after an airworthiness review that has been properly carried out, an ARC will be issued.)*

### **4.7 Airworthiness review records, responsibilities, retention and access**

*(This paragraph should describe how records are kept, the periods of record keeping, location where the records are being stored, access to the records and responsibilities.)*

## **'PART 4B PERMIT TO FLY PROCEDURES**

### **4B.1 Conformity with approved flight conditions**

*(The procedure should indicate how conformity with approved flight conditions is established, documented and attested by an authorised person.)*

### **4B.2 Issue of the permit to fly under the CAMO privilege**

*(The procedure should describe the process to prepare the EASA Form 20b (see Appendix IV to Part 21) and how compliance with 21A.711(d) and (e) is established before signature of the permit to fly. It should also describe how the organisation ensures compliance with 21A.711(g) for the revocation of the permit to fly )*

**4B.3 Permit to fly authorised signatories**

*(The person(s) authorised to sign the permit to fly under the privilege of M.A.711(c) should be identified (name, signature and scope of authority) in the procedure, or in an appropriate document linked to the CAME.)*

**4B.4 Interface with the local authority for the flight**

*(The procedure should include provisions describing the communication with the local authority for flight clearance and compliance with the local requirements which are outside the scope of the conditions of 21A.708(b) (see Part 21A.711(e))*

**4B.5 Permit to fly records, responsibilities, retention and access**

*(This paragraph should describe how records are kept, the periods of record keeping, location where the records are being stored, access to the records and responsibilities.)'*

## **PART 5 SUPPORTING DOCUMENTS APPENDICES**

### **5.1 Sample documents**

*(A self-explanatory paragraph)*

### **5.2 List of airworthiness review staff**

*(A self-explanatory paragraph)*

### **5.3 List of subcontractors as per AMC M.A.201(h) 1 and M.A.711(a) 3**

*(A self-explanatory paragraph, in addition it should set out that the list should be periodically reviewed)*

### **5.4 List of approved maintenance organisations contracted**

*(A self-explanatory paragraph, in addition it should set out that the list should be periodically reviewed)*

### **5.5 Copy of contracts for subcontracted work (appendix II to AMC M.A.201(h) 1)**

*(A self-explanatory paragraph)*

### **5.6 Copy of contracts with approved maintenance organisations**

*(A self-explanatory paragraph)*





Competent authority ~~surveyor~~ inspector: \_\_\_\_\_ Signature(s): \_\_\_\_\_

Competent authority office: \_\_\_\_\_ Date of Form 6F part 1 completion: \_\_\_\_\_

\*delete where applicable

**M.A. SUBPART F APPROVAL RECOMMENDATION REPORT  
EASA FORM 6F**

**Part 2: M.A. Subpart F Compliance Audit Review**

The five columns may be labeled and used as necessary to record the approval product line or facility, including subcontractor's, reviewed. Against each column used of the following M.A. Subpart F subparagraphs please either tick (√) the box if satisfied with compliance or cross (X) the box if not satisfied with compliance and specify the reference of the Part 4 finding next to the box or enter N/A where an item is not applicable, or N/R when applicable but not reviewed.

Para	Subject					
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M.A. 603	Terms <del>Extent</del> of approval	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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M.A. 604	Maintenance Organisation Manual (see Part 3)					
M.A. 605	Facilities					
M.A. 606	Personnel requirements					
M.A. 607	Certifying staff					
M.A. 608	Components, and tools	Equipment				
M.A. 609	Maintenance data					
M.A. 610	Maintenance work orders					
M.A. 611	Maintenance standards					
M.A. 612	Aircraft certificate of release to service					
M.A. 613	Component certificate of release to service					
M.A. 614	Maintenance records					

M.A. 615	Privileges of the organisation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A. 616	Management system Organisational review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A. 617	Changes to the approved maintenance organisation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A. 619	Findings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

M.A. 620	Means of compliance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A. 622	Immediate reaction to a safety problem	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Competent authority  
surveyor-inspectors(s):

Signature(s):

Competent authority  
office:

Date of Form 6F part 2 completion:

**M.A. SUBPART F APPROVAL RECOMMENDATION REPORT EASA FORM 6F**

**PART 3: Compliance with M.A. Subpart F maintenance organisation manual (MOM)**

Please either tick (✓) the box if satisfied with compliance; or cross (x) if not satisfied with compliance and specify the reference of the Part 4 finding; or enter N/A where an item is not applicable; or N/R when applicable but not reviewed.

Part A	General	
1.1	<input type="checkbox"/>	Table of content
1.2	<input type="checkbox"/>	List of effective pages
1.3	<input type="checkbox"/>	Record of amendments
1.4	<input type="checkbox"/>	Amendment procedure
1.5	<input type="checkbox"/>	Distribution
1.6	<input type="checkbox"/>	Accountable manager's statement
1.7	<input type="checkbox"/>	Safety policy
Part B	Description	
2.1	<input type="checkbox"/>	Organisation's scope of work
2.2	<input type="checkbox"/>	General presentation of the organisation
2.3	<input type="checkbox"/>	Name and title of management personnel
2.4	<input type="checkbox"/>	Organisation chart
2.5	<input type="checkbox"/>	Certifying staff
2.6	<input type="checkbox"/>	Personnel
2.7	<input type="checkbox"/>	General description of the facility
2.8	<input type="checkbox"/>	Tools, equipment and material
2.9	<input type="checkbox"/>	Maintenance data
Part C	General procedures	
3.1	<input type="checkbox"/>	<del>Organisational review</del> Management system, including record
3.2	<input type="checkbox"/>	Training
3.3	<input type="checkbox"/>	Contracting
3.4	<input type="checkbox"/>	One time authorisations

**M.A. SUBPART F APPROVAL RECOMMENDATION REPORT EASA FORM 6F**

**PART 3: Compliance with M.A. Subpart F maintenance organisation manual (MOM)**

Part D Working Procedures

- 4.1  Work order acceptance
- 4.2  Preparation and issue of work package
- 4.3  Logistics
- 4.4  Execution
- 4.5  Release to service – Certifying staff
- 4.6  Release to service – Supervision
- 4.7  Release to service – Certificate of release to service
- 4.8  Records
- 4.9  Special procedures
- 4.10  Occurrence reporting
- 4.11  Management of indirect approval of the manual

Part E Appendices

- 5.1  Sample of all documents used
- 5.2  List of subcontractors.
- 5.3  List of maintenance locations
- 5.4  List of Part 145 or M.A. Subpart F organisations

MOM reference:

MOM amendment:

Competent authority audit staff:

Signature(s):

Competent authority office:

Date of Form 6F part 3 completion:

**M.A. SUBPART F APPROVAL RECOMMENDATION REPORT  
EASA FORM 6F**

**Part 4: Findings regarding M.A. Subpart F compliance status**

Each level 1 and 2 finding should be recorded whether it has been rectified or not and should be identified by a simple cross reference to the Part 2 requirement. All non-rectified findings should be copied in writing to the organisation for the necessary corrective action.

Part 2 or 3  ref.	Audit reference(s):  Findings	L e v e l	Corrective action		
			Date Du e	Date Close d	Reference

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**M.A. SUBPART F APPROVAL RECOMMENDATION REPORT  
EASA FORM 6F**

**Part 5: M.A. Subpart F approval or continued approval or change recommendation**

Name of organisation:

Approval reference:

Audit reference(s):

The following M.A. Subpart F scope of approval is recommended for this organisation:

Or, it is recommended that the M.A. Subpart F scope of approval specified in EASA Form 3 referenced ..... be continued.

Name of recommending competent authority surveyor:

Signature of recommending competent authority ~~inspector~~ surveyor:

Competent authority office:

Date of recommendation:

Form 6F review (~~quality check~~):

Date:



**Appendix VII to AMC1 M.B.702(f) (c) Initial certification procedure EASA Form 13**

**M.A. SUBPART G APPROVAL RECOMMENDATION REPORT  
EASA FORM 13**

**Part 1: General**

Name of organisation:

Approval reference:

Requested approval rating/  
EASA Form 14 or AOC dated\*:

Other approvals held (if app.)

Address of facility(ies) audited:

Audit period: from                    to                    :

Date(s) of audit(s):

Audit reference(s):

Persons interviewed:

Competent authority ~~surveyor~~ inspector:

Signature(s):

Competent authority office:  
part 1 completion:

Date of EASA Form 13

\*delete as where applicable

<b>M.A. SUBPART G APPROVAL RECOMMENDATION REPORT EASA FORM 13</b>						
<b>Part 2: M.A. Subpart G Compliance Audit Review</b>						
<p>The five columns may be labelled and used as necessary to record the approval product line or facility, including subcontractor's, reviewed. Against each column used of the following M.A. Subpart G subparagraphs please either tick (√) the box if satisfied with compliance, or cross (X) the box if not satisfied with compliance and specify the reference of the Part 4 finding next to the box, or enter N/A where an item is not applicable, or N/R when applicable but not reviewed.</p>						
Para	Subject					
M.A.703	<del>Extent</del> Terms of approval	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A.704	Continuing airworthiness management exposition (see Part 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A.705	Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A.706	Personnel requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A.707	Airworthiness review staff	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A.708	Continuing airworthiness management	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A.201	Responsibilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A.202	External occurrence	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	reporting						
M.A.302	Aircraft maintenance programme						
M.A.303	Airworthiness directives						
M.A.304	Data for modifications and repairs						
M.A.305	Aircraft continuing airworthiness record system						
M.A.306	Operator's technical log system						
M.A.307	Transfer of aircraft continuing airworthiness records						
M.A.709	Documentation						
M.A.710	Airworthiness review						
M.A.711	Privileges of the organisation						
M.A.712	Quality system Management						
M.A.713	Changes to the approved continuing						

	airworthiness organisation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A.714	Continuing Airworthiness Management Record keeping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A.716	Findings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A.717	Management system record keeping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A.720	Means of compliance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A.721	Internal safety reporting scheme	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
M.A.722	Immediate reaction to a safety problem	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Competent authority surveyor inspectors(s):		Signature(s) :					
Competent authority office:		Date of Form 13 part 2 completion:					

<b>M.A. SUBPART G APPROVAL RECOMMENDATION REPORT</b>		<b>EASA</b>
<b>FORM 13</b>		
<b>PART 3: Compliance with M.A. Subpart G continuing airworthiness management exposition (CAME)</b>		
Please either tick (√) the box if satisfied with compliance; or cross (x) if not satisfied with compliance and specify the reference of the Part 4 finding; or enter N/A where an item is not applicable; or N/R when applicable but not reviewed.		
Part 0	General organisation	
0.1	<input type="checkbox"/>	Corporate commitment by the accountable manager
0.2	<input type="checkbox"/>	General information
0.3	<input type="checkbox"/>	Management personnel
0.4	<input type="checkbox"/>	Management organisation chart
0.5	<input type="checkbox"/>	Notification procedure to the competent authority regarding changes to the organisation's
0.6	<input type="checkbox"/>	Exposition amendment procedures
0.7	<input type="checkbox"/>	Alternative means of compliance procedure
Part 1	Continuing airworthiness management procedures	
1.1	<input type="checkbox"/>	Aircraft technical log utilisation and MEL application (commercial air transport) Aircraft continuing airworthiness record system utilisation (non-commercial air transport)
1.2	<input type="checkbox"/>	Aircraft maintenance programmes – development amendment and approval
1.3	<input type="checkbox"/>	Time and continuing airworthiness records, responsibilities, retention, access
1.4	<input type="checkbox"/>	Accomplishment and control of airworthiness directives
1.5	<input type="checkbox"/>	Analysis of the effectiveness of the maintenance programme(s)
1.6	<input type="checkbox"/>	Non-mandatory modification embodiment policy
1.7	<input type="checkbox"/>	Major modification standards
1.8	<input type="checkbox"/>	Defect reports
1.9	<input type="checkbox"/>	Engineering activity
1.10	<input type="checkbox"/>	Reliability programmes
1.11	<input type="checkbox"/>	Pre-flight inspections
1.12	<input type="checkbox"/>	Aircraft weighing

1.13	<input type="checkbox"/>	Check flight procedures
Part 2	<input type="checkbox"/>	<del>Quality</del> Management system procedures
2.1	<input type="checkbox"/>	Continuing airworthiness <del>quality</del> safety policy, audit plan and
2.2	<input type="checkbox"/>	Monitoring of continuing airworthiness management activities
2.3	<input type="checkbox"/>	Monitoring of the effectiveness of the maintenance
2.4	<input type="checkbox"/>	Monitoring that all maintenance is carried out by an appropriate maintenance organisation
2.5	<input type="checkbox"/>	Monitoring that all contracted maintenance is carried out in accordance with the contract, including subcontractors used by
2.6	<input type="checkbox"/>	<del>Quality audit</del> Compliance monitoring personnel
2.7	<input type="checkbox"/>	Hazard identification and safety risk management schemes
2.8	<input type="checkbox"/>	Safety action planning
2.9	<input type="checkbox"/>	Safety performance monitoring
2.10	<input type="checkbox"/>	Incident investigation and safety reporting
2.11	<input type="checkbox"/>	Emergency response planning
2.12	<input type="checkbox"/>	Management of change (including organisational changes with regard to safety responsibilities)
2.13	<input type="checkbox"/>	Safety promotion
2.14	<input type="checkbox"/>	Management system record keeping
Part 3	<input type="checkbox"/>	Contracted Maintenance
3.1	<input type="checkbox"/>	Maintenance contractor selection procedure
3.2	<input type="checkbox"/>	Detailed list of maintenance contractors
3.3	<input type="checkbox"/>	<del>Quality</del> Product audit of aircraft
Part 4	<input type="checkbox"/>	Airworthiness review procedures
4.1	<input type="checkbox"/>	Airworthiness review staff
4.2	<input type="checkbox"/>	Review of aircraft records
4.3	<input type="checkbox"/>	Physical survey
4.4	<input type="checkbox"/>	Additional procedures for recommendations to competent authorities for the import of aircraft
4.5	<input type="checkbox"/>	Recommendations to competent authorities for the issue of airworthiness review certificates
4.6	<input type="checkbox"/>	Issuance of airworthiness review certificates
4.7	<input type="checkbox"/>	Airworthiness review records, responsibilities, retention and access
Part 4B	<input type="checkbox"/>	Permit to fly procedures

- 4B.1  Conformity with approved flight conditions
- 4B.2  Issue of permit to fly under the CAMO privilege
- 4B.3  Permit to fly authorised signatories
- 4B.4  Interface with the local authority for the flight
- 4B.5  Permit to fly records, responsibilities, retention and access.

Part 5 Appendices-Supporting documents

- 5.1  Sample Documents
- 5.2  List of airworthiness review staff
- 5.3  List of subcontractors as per M.A.711 (a) 3 and AMC M.A.201 (h)
- 5.4  List of approved maintenance organisations contracted
- 5.5  Copy of contracts for subcontracted work (Appendix II 2 to AMC M.A.201 (h) 1
- 5.6  Copy of contracts with approved maintenance organisations

CAME Reference:

CAME Amendment:

Competent authority audit staff:

Signature(s):

Competent authority office:

Date of EASA Form 13 part 3 completion:

**M.A. SUBPART G APPROVAL RECOMMENDATION REPORT  
EASA FORM 13**

**Part 4: Findings regarding M.A. Subpart G compliance status**

Each level 1 and 2 finding should be recorded whether it has been rectified or not and should be identified by a simple cross reference to the Part 2 requirement. All non-rectified findings should be copied in writing to the organisation for the necessary corrective action.

Part 2 or 3 ref.	Audit reference(s):  Findings	L e v e l	Corrective action		
			Date Due	Date Closed	R e f e r e n c e



**M.A. SUBPART G APPROVAL RECOMMENDATION REPORT  
EASA FORM 13**

**Part 5: M.A. Subpart G approval or continued approval or change recommendation**

Name of organisation:

Approval reference:

Audit reference(s):

The following M.A. Subpart G scope of approval is recommended for this organisation:

Or, it is recommended that the M.A. Subpart G scope of approval specified in EASA Form 14 referenced ..... be continued.

Name of recommending competent authority ~~surveyor~~ inspector:

Signature of recommending competent authority ~~surveyor~~ inspector:

Competent authority office:

Date of recommendation:

Form 13 review (~~quality check~~) :

Date: