European Union Aviation Safety Agency

FAQ n.19049

FAQs:

Airworthiness review, Part-M, Continuing Airworthiness, Regulations

Question:

Can airworthiness review staff (ARS) qualified under point CAMO.A.310 perform an airworthiness review of an aircraft on which they have previously released maintenance as certifying staff?

Answer:

Point CAMO.A.310(a)(4) of Annex Vc (Part-CAMO) to Commission Regulation (EU) No 1321/2014 establishes that airworthiness review staff (ARS) in a Part-CAMO organisation must have a position within the approved organisation with appropriate responsibilities.

According to point (e) of AMC1 CAMO.A.310(a), an acceptable means to show compliance in respect of such position is to demonstrate independence from the airworthiness management process of the affected aircraft (this is to avoid possible conflict of interest). In the case where ARS qualified in accordance with point CAMO.A.310 is employed by an organisation holding both CAMO and maintenance organisation (Part-145 or Part-CAO) approvals, the second bullet point under point (e) of AMC1 CAMO.A.310(a) further specifies that this person should not have been involved in the release of the maintenance for the aircraft intended to undergo the airworthiness review, except in one of the following cases:

1. such maintenance has been released as required during the airworthiness review's physical survey of the aircraft (e.g. release necessary after visual inspections requiring panel opening); or
2. such maintenance has been released as a result of findings discovered during the physical survey of the aircraft (defect rectification).

In other cases where the CAMO ARS happens to be employed as certifying staff (CS) at another maintenance organisation, or happens to work as independent CS, the European Union Aviation Safety Agency (EASA) recommends the CAMO ARS to ensure absence of conflict of interest before allowing them to conduct the airworthiness review on aircraft on which they have previously released maintenance.

Remark

Point M.A.901(l) or point ML.A.903(b) of Annex I (Part-M) to Commission Regulation (EU) No

1321/2014: When the ARS is not qualified as CS, they must be assisted by CS in case maintenance needs to be released during the physical survey of the aircraft.

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Link:

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