European Union Aviation Safety Agency

CAMO (Continuing Airworthiness Management Organisation)

Are deputies to nominated persons required in CAMO or CAO?

Answer

Part-M Subpart G, Part-CAMO and Part-CAO do not contain specific requirements for the identification of deputies to “nominated persons” as it is foreseen in Part-145 (145.A.30(b)(4)).

Nevertheless, the CAMO or CAO needs to take into account the conditions for the continued validity of the approval laid down in M.A.715, CAMO.A.135 or CAO.A.110, in particular in case of findings or in case of changes.

The CAMO or CAO should ensure that they remain in compliance even during short/medium absence of the nominated persons, this could be achieved by identifying in the CAME or CAE “one or several deputies” and the conditions under which the deputies will assume such responsibility. For longer absence of the nominated person, it is recommended to identify a new nominated person. For Part-M Subpart G organisations, the nomination and acceptance by the competent authority is done using the EASA Form 4. For Part-CAMO and Part-CAO approvals no EASA Form 4 is foreseen and the acceptance by the competent authority is formalised by the approval of an amendment to the exposition.

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Under which condition can a CAMO or CAO use the indirect approval procedure to amend AMP (Aircraft Maintenance Programme) task(s) under Part-M?

Answer

The indirect approval procedures may only be used for:

- non-safety-related tasks as described in case 2 of FAQ n.48248 and example 3 of FAQ

n.48249

- de-escalated tasks as described in example 1 of FAQ n.48249

- additional tasks as described in example 2 of FAQ n.48249

- editorial issues, typos, etc., (without having an effect on the AMP content)

In such case, as required by M.A.302(c) and M.B.301(c), the CAME (Continuing Airworthiness Management Exposition) or CAE (Combined Airworthiness Exposition) must include, and the competent authority shall approve, a procedure describing as a minimum:

- which AMP amendments are eligible for indirect approval;
- who in the organisation is responsible to issue the indirect approval;
- how the amendments are controlled; and
- how and when the competent authority is informed of an AMP amendment.

Based on M.A.302(c), the indirect approval may only be used when:

- the aircraft is managed by a CAMO/CAO or there is a limited contract between the owner and the CAMO/CAO for the development and approval of the AMP;
- and
- the aircraft managed by the CAMO/CAO is registered in the Member State ensuring the oversight of this CAMO/CAO (unless an agreement exists between the competent authority for the AMP and the competent authority of the CAMO/CAO).

Remark

AMPs regulated by Part-ML are not subject to an approval by the competent authority.

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Does the CAMO or CAO compliance monitoring/quality system need to be subject to internal audit?

Answer

Yes, the compliance monitoring/quality system is part of the activities of the CAMO or CAO and therefore it should be monitored by internal audit.

Points M.A.712(b), CAMO.A.200(a)(6) or CAO.A.100(b) requires that the compliance monitoring/quality system monitors the compliance of the organisation with its relevant requirements and procedures.

The compliance monitoring/quality procedures are considered to be within the scope of this monitoring function. Therefore, the compliance monitoring/quality system should also be subject to audits and the CAMO or CAO audit programme/plan needs to reflect this.

Besides that, the audits conducted in respect of the compliance monitoring/quality system should satisfy the requirement of independence. This means that audits should be carried out by personnel not responsible for the functions, procedures or products being checked.

So, the compliance monitoring/quality staff cannot audit the compliance monitoring/ quality system themselves because of the necessary independence of the audit. Therefore, to audit the compliance monitoring/quality system, it is acceptable:

- to use competent personnel from a different section/department in the same organisation not responsible for the compliance monitoring/quality function/ procedure, or,
- to contract the independent audit element of the compliance monitoring/quality system to another organisation or a qualified competent person, or,
- that the compliance monitoring/quality system is monitored and certified against an internationally recognised standards by a certification organisation.

The way the compliance monitoring/quality system is going to be audited has to be described in the CAME or CAE and approved by the competent authority.

For a small CAO, as defined in CAO.A.100(e), the quality system may be replaced by regular organisational review. Further information on the organisational review can be found in ‘AMC1 CAO.A.100(f)’ and ‘Appendix II to AMC1 CAO.A.100(f)’.

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The requirement to establish a procedure to assess non-mandatory modifications/inspections pursuant to CAMO.A.315(b)(4) refers to the “use of the organisation’s safety risk management process”. What does this mean?

Answer

The CAMO has the obligation, for complex motor-powered aircraft and aircraft used by air carriers licensed in accordance with Regulation (EC) No 1008/2008, to establish a procedure to assess non mandatory modifications and inspections (e.g. Service Bulletins).

This assessment should result in a decision to implement or not the recommendation provided in such non-mandatory information (e.g. perform the inspection, embody the modification, amend the aircraft maintenance programme (AMP)).

This assessment procedure should take into consideration several aspects, as the case may be, including but not limited to:

- the applicability to the operator's fleet (e.g. type of operating environment, utilization, aircraft configuration);
- achievement of operator's safety objectives;
- mitigating potential aviation safety risks already identified by the operator;
- mitigating potential aviation safety risks not yet apparent to the operator but identified by other operators or TC/STC holder, for aircraft in a similar operational environment;
- reliability improvement of the aircraft and components; and
- improvement of the effectiveness of the AMP.

In case of potential aviation safety risks, the CAMO should review the hazard(s) identified in the recommendation and the proposed maintenance action and its timeframe (i.e. timeline to embody the modification or amend the AMP). This is the main purpose of the expression "making use of the organisation's safety risk management process". If necessary, the CAMO will perform a safety risk assessment (e.g. in terms of probability and severity of consequences) and a review of the related mitigations.

Typically, SBs are issued for technical purposes (as mitigation or safety risk control). For instance, a SB could provide the following:

- an elimination of an identified hazard by the embodiment of a modification, or
- reducing the safety risk (i.e. the severity and/or likelihood) of the consequences of an identified hazard by the embodiment of a modification, or
- reducing the likelihood of the consequences of an identified hazard by performing repetitive inspections.

Since SBs are also used for other purposes (e.g. optional equipment installation, commercial retrofit) and not only for potential safety-related situations, it is not required to use safety risk management process for each SB.

The CAMO should use its safety risk management process to determine if the hazard identified in the SB applies to the managed fleet and what the associated risk is, and/or whether the proposed action (modification/inspection) are applicable, effective and reasonable. For clarity, it is not intended that the CAMO should redo the safety assessment performed by the design approval holder; the CAMO assessment should be tailored to its fleet and related operations.

The referred CAME procedure for the assessment of non-mandatory modifications and inspections should ideally describe the decision-making process and mandate to record the

decision taken and its justifications (e.g. based on considerations of costs vs benefits such as safety or reliability).

The decision to embody a modification may require the change management process to be followed to ensure proper coordination between the aircraft operator, the CAMO and the approved maintenance organisation. For example, a modification that affects Mass and Balance, requires maintenance check flights, introduces revised flight manual procedures, maintenance manual procedures, changes to the AMP, which needs to be managed to ensure proper dissemination of the information, training, review of existing hazards, and review of risk assessment, as applicable.

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