European Union Aviation Safety Agency

FAQ n.136743

FAQs:

CAMO (Continuing Airworthiness Management Organisation), Part-M, Continuing Airworthiness, Regulations

Question:

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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