**GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO (Revision January 2020)**

**Foreword**

Regulation (EU) 2019/1383 amending Regulation (EU) No 1321/2014 introduces a new structure and new types of organisations (Part-CAO and Part-CAMO) in the Continuing Airworthiness domain, as of 24 March 2020. This guide offers the view of EASA on the transition of existing continuing airworthiness organisations to the new Part-CAO and Part-CAMO organisation, based on Article 4 of Regulation (EU) No 1321/2014 as amended. This is not binding material.

EASA reminds that this transition process will be under the oversight of the competent authority and that any particular case or situation should be discussed and agreed with the competent authority.

This guide takes into account the amendments that are currently being adopted to correct and complement Regulation (EU) 2019/1383 amending Regulation (EU) No 1321/2014 (agenda Item 10 of EASA Committee 23-24 Oct. 2019) and referred to as Regulation (EU) 2020/XXXX in this document.

# List of revisions

|  |  |
| --- | --- |
| November 2019 | Version for discussion at the P&CA TeB 2019-2 |
| January 2020 | To introduce comments from the P&CA TeB.Main changes:* Change of the steps sequence and time of approval of the amended manual/exposition
* Rewording of the ‘generic transition finding’
* Introduction of competent authority oversight schematics (Chapter IV)
* In Chapter V, consideration of changes affected by a Part-CA(M)O novelty
* Appendix III amended to reflect the new M.A.711 AMP approval privilege for Part-ML aircraft introduced by Reg. (EU) 2020/XXXX
* Appendix IX introduced to help amending CAME from Part-MG to Part-CAMO
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| Document prepared by: | EASA, FS.1.1 |

# Introduction

## General

Regulation (EU) 2019/1383 amending Regulation (EU) No 1321/2014 becomes applicable on 24 March 2020. Thereby the structure of the regulation (EU) No 1321/2014 is modified as shown below:

|  |  |  |
| --- | --- | --- |
| **Reference** | **Designation** | **Topic** |
| Annex I | Part-M | Continuing airworthiness standards – other-than-‘light aircraft’ and aircraft used by licenced air carrier (Reg. (EC) No 1008/2008) |
| Includes Subpart F and Subpart G organisation requirements, applicable only until 24-Sep-2021 |
| Annex II | Part-145 | Maintenance organisation (all types of aircraft types and operation) |
| Annex III | Part-66 | Maintenance licensing |
| Annex IV | Part-147 | Maintenance training organisation |
| Annex Va | Part-T | Requirements for 3rd country a/c dry leased by an AOC |
| Annex Vb | Part-ML | Continuing airworthiness standards – ‘light aircraft’ not used by licenced air carrier |
| Annex Vc | Part-CAMO | Continuing airworthiness management organisation (all types of aircraft types and operation) |
| Annex Vd | Part-CAO | Combined (continuing airworthiness management and/or maintenance) organisation – non-complex aircraft and non-licenced air carrier |

Note: the (unofficial) denomination ‘Light aircraft’ means the following non-complex motor-powered aircraft:

* aeroplanes up to 2730 Kg MTOM
* rotorcraft up to 1200 Kg MTOM / max 4 occupants
* other ELA2 aircraft.

**Important:**

Part-ML is the only option for ‘light aircraft’ not used by licenced air carrier. All other aircraft must follow Part-M.

It is not allowed to ‘voluntary’ apply Part-M on ‘light aircraft’ not used by licenced air carrier.

As a consequence, from 24 March 2020, each aircraft must follow either Part-M or Part-ML standard, and any person or organisation involved in continuing airworthiness must comply with Part-M, or Part-ML or both, depending on the scope of activities (related type(s) of aircraft and operation(s)).

Regulation (EU) 1321/2014 does not introduce a ‘Part-ML organisation’ because Part-ML is only a standard for ‘light aircraft’. However, all types of organisations provided for in this Regulation (Part-CAMO, Part-CAO, Part-145) may be involved in continuing airworthiness activities for aircraft following Part-ML.

The new organisations introduced by this amendment are **Part-CAO** organisations and **Part-CAMO** organisations.

* **Part-CAMO** provides requirements for Continuing Airworthiness Management Organisation (CAMO): compared with Part-M Subpart G organisation, the main difference is the introduction of SMS principles.
* **Part-CAO** provides a new set of requirements for Combined Airworthiness Organisation: such organisation may perform CAMO activities or Maintenance Organisation activities, or both, but limited to non-complex aircraft not used by a licenced air carrier.

These **Part-CAMO** and **Part-CAO** organisations are supposed to gradually replace Part-M Subpart F and Part-M Subpart G organisations. In accordance with Article 4 of Regulation (EU) 1321/2014 as amended, **after 24 September 2021, there should be no more Part‑M Subpart F and Part-M Subpart G organisations.** This is the reason why, to be able to continue their activities, the existing Part‑M Subpart F and Part-M Subpart Gorganisations must eventually receive a new approval.

## Transition

To facilitate the issue of new approval for existing organisation, Article 4 of Regulation (EU) No 1321/2014 (as amended) offers the possibility for organisations with a valid Part-M Subpart F, Part-M Subpart G and Part-145 approval to make a transition to Part-CAO or Part-CAMO, instead of following the complete process of an initial approval to Part-CAO or Part-CAMO.

Depending on the current approval and scope held, the existing organisation may choose one of the below proposed transition paths:

|  |  |
| --- | --- |
| **Existing approval** | **New approval using transition** |
| **Approval type** | **Scope** | **Approval type** | **Limitation** |
| Part-M Subpart G  | complex motor-powered aircraft (CMPA)[[1]](#footnote-1) and/or aircraft used by licensed air carriers[[2]](#footnote-2) | Part-CAMO | none |
| Part-M Subpart G | non-CMPA not used by licenced air carrier | **Or** | Part-CAO | continuing airworthiness management only |
| Part-CAMO | none |
| Part-M Subpart G | All types of aircraft and operation | Part-CAMO | none |
| Part-M Subpart F | non-CMPA not used by licenced air carrier | Part-CAO  | maintenance only  |
| No transition facilitation to Part-145 (initial approval required) | Not applicable |
| Part-145  | non-CMPA not used by licenced air carrier | **Or**  | Part-CAO | maintenance only (see note 2) |
| keep Part-145 (no transition) | none |
| Part-145 | All types of aircraft and operation | Transition to Part-CAO not possible for that scope of work: keep Part‑145 | Not applicable |

If existing approved organisation do not transition to Part-CAO or CAMO:

* + Part-145 organisation may continue their activities with the Part-145 approval;
	+ Part-M Subpart F organisation may continue their activities with the Part-MF approval only until 24 September 2021;
	+ Part-M Subpart G organisation may continue their activities with the Part-MG approval only until 24 September 2021.

Note: If an organisation holds both continuing airworthiness and maintenance approvals, this organisation can make a single request to the competent authority to transition both approvals to a single CAO (to the extent that both existing approvals satisfy the above transition paths)

The request from organisation to apply for such transition to Part-CAO and Part-CAMO should be made to the competent authority in a form and manner established by such authority. EASA recommends to make such request, if possible, before 24 March 2020 (to allow the competent authority to anticipate the number of request to be processed). The competent authority can only issue the CA(M)O certificate after 24 March 2020. The transition period ends on 24 September 2021, so the request should be made sufficiently in advance of this date to allow for completion of the transition process in due time .

If an organisation wish to transition only one part of its activities to Part-CAO (e.g. non-CMPA scope of work of Part-145), EASA recommends to address this case as a new approval and not as a transition. This is because, in order to follow the transition process, an existing approved exposition or manual is required as a basis for that particular activity.

EASA reminds that this transition process will be under the oversight of the competent authority and that any particular case or situation should be discussed and agreed with the competent authority.

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| **Convention:** in the rest of the document:* ‘Part-MG’ and ‘Part-MF’ will designate respectively ‘Part-M Subpart F’ and ‘Part-M Subpart G’
* ‘Part-CA(M)O’ will designate ‘Part-CAO or Part-CAMO’
 |

# Overview of the transition to Part-CA(M)O

The following figure provides an overview of the expected transition process and chronology in accordance with Article 4 of Regulation (EU) No 1321/2014 (as amended):

Reg. (EU) 2019/1383

becomes applicable

(24-Mar-2020)

Reg. (EU) 2019/1383

enters into force

(24-Sep-2019)

End of transition

24-Sep-2021

NOT YET APPLICABLE

Part-145 org. Part-145 org. not requesting CAO

Part-145 org.

Part-145 org.

Part-CAO org. (if requested) 

Part-CAO org.

Part-MG org.

Part-MG org.

Part-CAO org. (if requested)

Part-CAMO org. (if requested)

Part-CAMO org.

Part-MG org.

Part-MG org.

Part-CAO org.

Part-MF org.

Part-MF org.

Part-CAO org. (if requested)

Part-CAO org.

Phase 1:

Transition to Part-CAMO and Part-CAO

Phase 0:

Alignment with Regulation (EU) No 1321/2014 (as amended)

Phase 2:

Subpart F and Subpart G no longer applicable

Note: Approvals to Part-MF and Part-MG may still be issued until 1 year after EIF

The following figure provides an overview of the step approach developed in the next chapter.

24-Sep-2021

24-Mar-2020

24-Sep-2019

Prepare revision of exposition/manual to comply with amendments to Reg. (EU) No 1321/2014
(e.g. references to Part‑ML)

By Competent Authority

Request CA(M)O

By Organisation

Part-145/-MF/-MG org.

**Issue CA(M)O certificate**

Raise generic ‘transition finding’

Surveillance iaw Part-145/-MF/-MG

CA(M)O org. (existing scope of work)

CA(M)O org.

Surveillance iaw Part-CA(M)O

 ‘transition findings’ raised and closed

Submit revision of exposition/manual with CA(M)O approval reference

**Approve** exposition/manual (or indirect approval)

Submit CA(M)E

**Approve CA(M)E** and **re-issue CA(M)O certificate**

Revoke CAO if ‘transition findings’ not closed

**Note:** request for Part-CA(M)O may be sent to competent authority before the applicability date, but the competent authority can only issue the CA(M)O certificate after the applicability date

# Steps approach for transition to Part-CA(M)O

The following propose a 10-steps approach for the transition of Part-145/-MF/-MG organisation to Part-CAO or Part-CAMO

**Overview:**

|  |  |  |
| --- | --- | --- |
| Phase | Step | Description |
| 0 | 0 | **Compliance with Regulation (EU) 2019/1383 and 2020/XXXX** |
| 1 | 1 | **Eligibility to Part-CA(M)O** |
| 2 | **Request for Part-CA(M)O approval** |
| 3 | **Exposition/manual amendment** |
| 4a | **Initial CA(M)O approval**  |
| 4b | **Finding notifications** |
| 5 | **Implementation plan** |
| 6 | **Acceptance of the plan** **and oversight programme adjustment** |
| 7 | **Oversight during transition** |
| 8 | **Implementation plan execution**  |
| 9 | **Final CA(M)O approval** |
| 2 | 10 | **End of transition and changes to organisation** |

**Convention:** in the following table, the term “exposition/manual” designates the type of document used by the organisation demonstrating compliance with Part-MF/-MG/-145 at the time when the organisation requests a transition to Part-CA(M)O, while the term “CA(M)E” designates the organisation exposition demonstrating compliance to Part‑CA(M)O at the end of the transition process. After approval of the “CA(M)E”, the approval of the “exposition/manual” is no longer valid.

| Step | Action | Remark |
| --- | --- | --- |
| 0 | **Compliance with Regulation (EU) 2019/1383 and 2020/XXXX**It is assumed that when Regulation (EU) 2019/1383 becomes applicable, Part-145, Part-MF and Part-MG organisations have prepared the necessary amendments to the exposition/manual to be in compliance with Part-145, Part-MF and Part-MG as amended (Reg. (EU) 2019/1383 and 2020/XXXX).  | This means that Part-145, Part-MF and Part-MG organisations, if working on Part-ML aircraft, have introduced reference to (or amendments in compliance with) Part-ML.Appendix I provides a list of some of the main changes introduced by Reg. (EU) 2019/1383 and 2020/XXXX |
| 1 | **Eligibility to Part-CA(M)O**The organisation reviews the eligibility for their organisation to transition to Part‑CA(M)O, analysing existing (and future desired, where applicable) scope of work. | Note:Part-CAO is applicable under the following conditions:1. The aircraft is not used by a licensed air carrier;
2. The aircraft is a not a complex motor-powered aircraft
 |
| 2 | **Request for Part-CA(M)O approval**The approved organisation requests a Part-CA(M)O approval to the competent authority in a form and manner acceptable to the competent authority.Note: the organisation may already accompany this request with a draft of the ‘implementation plan’ which will be asked to the organisation at step 4b.The competent authority verifies the eligibility of the organisation, and if the organisation is eligible, **informs the organisation of the future CA(M)O approval number/reference** ([Member State].CAO.[XXXX] or [Member State].CAMO.[XXXX]). | **Preferably before 24 March 2020 and in any case, before 24 September 2021** |
| 3 | **Exposition/manual amendment**The organisation submit the amendment to the existing exposition/manual to the Competent Authority for approval. This amendment introduces:* the changes necessary to comply with Part-145/-MF/-MG as amended by Reg. (EU) 2019/1383 and 2020/XXXX (see step 0)
* the approval number/reference ([Member State].CAO.[XXXX] or [Member State].CAMO.[XXXX]) provided by the competent authority (step 2). This reference is to be introduced, in particular, into EASA Form 1 and EASA Form 15 organisation templates.

Once approved, the organisation uses this amended exposition/manual until the re-issue of the Part‑CA(M)O certificate and the approval of the CA(M)E (step 9). | Indirect approval of the exposition/manual may be acceptable for that step (due to the temporary nature of the exposition/manual approval and considering that no new privilege are added), if the exposition/manual contains such procedure, unless otherwise specified by the competent authority.(**Note:** the final CA(M)E will not be subject to indirect approval) |
| 4a | **Initial CA(M)O approval** 1. The competent authority issues an ‘EASA Form 3-CAO’ or an ‘EASA Form 14’ certificate with the approval number/reference ([Member State].CA(M)O.[XXXX]) provided to the organisation at step 2. This certificate must reflect the same privileges as the ones hold by the organisation under Part-145/-MF/-MG and not exceed the Part-CA(M)O defined privileges;
2. The competent authority approves the amended exposition/manual

**NOTE:** The competent authority may make certain verifications (e.g. privileges, scope of work, update of organisations forms, consideration of Part-ML if applicable), but it is not the intent to verify compliance to Part-CA(M)O at this stage. The intent is to “grandfather” the existing organisation as a Part-CA(M)O organisation.1. The organisation surrender the existing Part-MF/-MG or Part-145 certificate to the competent authority;
 | **Not before 24 March 2020 and in any case, before 24 September 2021**Initial EASA Form 3-CAO (for Part-CAO) or EASA Form 14 (for Part-CAMO) certificates should include, on page 2, the reference to the amended exposition/manual with the mention “on the basis of Article 4(4)/4(5) of Regulation (EU) No 1321/2014 (as amended)”In case an organisation holds both Part-MF and MG approvals and request a Part-CAO covering both activities, references to both expositions/manuals (if they are separated) should be mentioned on page 2. |
| 4b | **Finding notifications**The competent authority also:1. notifies to the applicant a ‘generic transition finding’
2. transfer the open findings raised against Part-MF/-MG or Part-145 into ‘oversight findings’ against the relevant equivalent Part-CA(M)O requirements with no change in agreed closure dates.

Remark: if no equivalent requirement exist in Part-CA(M)O, the finding should be closed without further showing.  | **Proposed wording for the ‘Generic transition finding’ (Level 2):**“On the basis of Article 4(4) (or 4(5)) of Regulation (EU) No 1321/2014 (as amended), approval reference [Member State].CA(M)O.[XXXX] is issued to [Company name], but the organisation has not demonstrated that it complies with all requirements of Annex Vc (Part-CAMO) or Annex Vd (Part-CAO) to Regulation (EU) No 1321/2014. The organisation shall take necessary measures to demonstrate to the satisfaction of the competent authority that, before 24 September 2021, it complies with the applicable requirements newly introduced by Part-CA(M)O and not included in Part-145/-MF/-MG. To this end, the organisation should establish and communicate to the competent authority an implementation plan. In the meantime the organisation shall continue working with the existing procedures as per the approved exposition/manual amended to account for the new approval reference and amendments to Regulation (EU) No 1321/2014.”For the re-notification of existing findings, the competent authority may use the correspondence tables provided in appendices.  |
| 5 | **Implementation plan**As a response to the ‘generic transition finding’, the organisation develops and submits a implementation plan that includes the following:* Gap analysis between the existing organisation procedures and the new Part-CA(M)O requirements.
* A roadmap for developing the CA(M)E (compliant with Part-CA(M)O)
* Training of staff on Part-CA(M)O and training on the future CA(M)E
 | For the gap analysis, please refer to the correspondence tables between Part-MF/-MG/-145 and Part-CAMO/-CAO provided in appendices.Note: The CAE should not be considered to be a revision of the existing exposition/manual but a new document. |
| 6 | **Acceptance of the implementation plan and oversight programme adjustment**The competent authority assess the implementation plan proposed by the organisation, and if the assessment concludes that it is sufficient to address the transition, accept this plan.The competent authority also review the existing oversight programme, considering the following:* For requirements which are not new in Part-CA(M)O (i.e. for which there is an equivalent in Part-MF/-MG/-145), the competent authority may take credit from oversight activities (audits, inspections, etc.) already performed as part of the ongoing oversight cycle to declare compliance of the organisation with the concerned Part-CA(M)O requirements.
* The current audit cycle may be continued, but the oversight programme should be reviewed to ensure that, before 24 September 2021, the competent authority will have checked compliance of the organisation against the Part-CA(M)O novelties (i.e. requirement which are newly introduced in Part-CA(M)O and for which there is no equivalent in Part-MF/-MG/-145) (see chapter IV).
 | Please refer to the correspondence tables between Part-MF/-MG/-145 and Part-CAMO/-CAO provided in appendices. |
| 7 | **Oversight during transition**The competent authority continues to perform the oversight of the organisation, but in accordance with :* Part-CA(M)O;
* the implementation plan;
* the amended exposition/manual.
 | For the oversight activities during the transition period, it is proposed to use 2 types of findings:* **Transition finding**: Finding raised against requirements which are newly introduced in Part-CA(M)O (novelties).

Closure date for these transition findings shall not exceed **24 September 2021.** This include the ‘generic’ transition finding.* **Oversight finding**: Finding raised against Part-CA(M)O requirements for which an equivalent requirement already exists in Part-MF/-MG/-145.

Oversight findings should be managed in accordance with CAMO.B.350 or CAO.B.060 as applicable.Please refer to the correspondence tables between Part-MF/-MG/-145 and Part-CAMO/-CAO provided in appendices. Column 3 offers a recommended policy for the finding classification (transition vs oversight findings). This column also includes a summary of the novelties where relevant. |
| 8 | **Implementation plan execution** Organisation execute the implementation plan, including the acquisition of the necessary resource and the development of the CA(M)E. It should be ensured that the staff receives difference training on the future approved CA(M)E and associated procedures.The drafting of the CA(M)E should take into account the transition findings raised by the competent authority during the oversight. But it should be avoided to submit successive exposition amendments for approval with the aim to close these transition findings individually. Once the CA(M)E is considered fully compliant with Part-CA(M)O, it shall be submitted to the competent authority for approval.  | The competent authority review the implementation by desktop activities and onsite audit as specified in the oversight programme reviewed at step 6.Note: The CAE should not be considered to be a revision of the existing manual/exposition but a new document.To help in the CAE development, appendixes VI, VII and VIII offer cross-references between the CAE and respectively the MOE, MOM and Part-MG CAME.To help in the CAME development, appendixes IX highlights the difference with the Part-MG exposition. |
| 9 | **Final CA(M)O approval**At this stage, the competent authority should have:* checked compliance of the organisation against every Part-CA(M)O novelties
* checked that every ‘**transition finding’** raised during oversight has been closed;
* implementation plan has been completed.

The competent authority issues a recommendation report, approves the CA(M)E, issue a revision of the ‘EASA Form 3-CAO’ or ‘EASA Form 14’ certificate and closes the ‘generic transition finding’.On the certificate, the mention introduced on page 2 (step 4a) should be removed and the reference to the approved CA(M)E should be introduced. | **Before 24 September 2021**Note: at this stage, an ‘**oversight finding’** may remain open, within the limit of CAMO.B.350 or CAO.B.060 |
| 10 | **End of transition and changes to organisation** At this stage, the organisation becomes a full compliant Part-CA(M)O organisation and therefore the present guide, and in its appendices, are no longer applicable.The organisation may apply for a change to withdraw a limitation introduced at step 4 or to extend the scope of work as foreseen by Part-CA(M)O.After 24 September 2021: * Part-MF/-MG organisations which have initiated, but not completed the transition to Part-CA(M)O shall be revoked, limited or suspended, in whole or in part;
* Part-MF/-MG organisations which have not applied to a Part-CA(M)O shall be revoked.
 | Changes must follow Part-CA(M)O requirements and the approved CA(M)E. |

# Overview of Competent authority oversight during transition

The following figure provides an overview of the content of the competent authority oversight programme during the transition (in accordance with steps 4b, 6 and 7 of preceding chapter).



\*: recommendation report at the end of this cycle will mark:

* the particular novelty ‘Ni‘ as applicable and reviewed;
* the novelties other than Ni as applicable but not reviewed (‘N/R’).

This particular Ni novelty is part of the subsequent 2 YE oversight cycle, but it may be rechecked after 24 Sep 2021.

The following figure provides an overview of the management and outcomes of findings:



# Changes to the Part-MF, Part-MG or Part-145 organisation

Independently of the transition to CA(M)O, certain change may need to be introduced in the organisation during the transition. The following constitutes the guidance for the management of the requests for change to the organisation during the transition period (e.g. change of nominated person).

* **Request for change submitted by the organisation before Step 4** need to be managed as agreed with the competent authority
* **Request for change submitted by the organisation between Step 4 and Step 9** need to follow the organisation’s change procedure (as specified in the exposition/manual) valid at time of request. In particular:
	+ new privilege provided for in Part-CAO (e.g. maintenance for a subpart G organisation) cannot be granted by the competent authority at this stage (see note below).
	+ If the change is affected by a Part-CA(M)O novelty without introducing a new Part-CAO privilege, it may be approved by the competent authority if it complies with the current exposition/manual and associated procedures, but a ‘transition finding’ should be raised if it does not comply with the Part-CA(M)O novelty.
	+ The existing organisation exposition/manual should be amended to introduce this change upon its approvals.
* A change approved and introduced in the existing organisation exposition/manual **between Step 4 and Step 9** should normally be reflected in the CA(M)E under development.
* **Request for changes submitted by the organisation after Step 9,** need to follow Part-CA(M)O requirements and the approved CA(M)E

**Note 1:** minor amendments to the exposition/manual may still be approved through an indirect approval procedure if the organisation holds such procedure. However if the amendment is affected by a Part-CA(M)O novelty, this should be highlighted to the competent authority while notifying the amendment.

**Note 2**: the above guidance relates to changes to the original organisation, necessary to ensure the continuity of the business; this does not prevent that, as part of the transition activities (and implementation plan) to Part-CA(M)O, the organisation seeks a Part-CA(M)O terms of approval **at Step 9** going beyond the original scope of approval (e.g. maintenance for a Part‑MG organisation transitioning to Part-CAO). The implementation plan should in this case be clear about such intention and the competent authority should include the additional relevant elements in their oversight programme. The provisions which relate to the new intended scope of approval should be treated as novelties by the competent authority and subject to ‘transition findings’.

# Proposed actions by Competent Authorities (CA):

1. Between entry into force and applicability date:
2. amendment of CA procedures iaw Regulation (EU) 2019/1383
3. training of CA staff, in particular on SMS and assessment of organisations’ management system
4. Develop CA implementation plan and monitor progress implementation
5. Provide information and guidance to impacted organisations and persons on main differences and novelties:
* Structure of regulation
* Options for combinations of approvals and privileges
* Training of organisation’s staff (e.g. SMS for Part-CAMO)
* Application process considering CAO.A.015, CAO.A.020, CAO.A.025(b) and CAO.A.095 or CAMO.A.115, CAMO.A.125 and CAMO.A.300(b)
* Deadlines and consequences (e.g. revocation)
1. Update (IT) control systems and Forms
2. Assess impact on resources and take necessary actions

# Appendices

## Appendix I — Compliance with Regulation (EU) 2019/1383 and 2020/XXXX

Before 24 March 2020 organisations holding a valid Part-MG, Part-MF or Part-145 approval certificate should amend their exposition/manual and associated procedures where applicable to account for changes introduced by Regulation (EU) 2019/1383 and 2020/XXXX.

For that purpose, below is a non-exhaustive list of some of the main changes:

**Airworthiness Review**

* EASA Forms 15a/b/c are updated. As of 24 March 2020, EASA Forms 15 have to be used as follows:
* EASA Form 15a: to be issued by the competent authority for aircraft following Part-M regime.
* EASA Form 15b: to be issued either by Part-CAMO or Part-CAO (or Subpart G during transition period) for aircraft following Part-M regime.
* EASA Form 15c: to be issued either by Part-CAMO, Part-CAO, Subpart F, Subpart G, Part-145, independent airworthiness review staff, or the competent authority for aircraft following Part-ML regime.

Note: existing Airworthiness Review Certificates (ARC) issued before 24 March 2020 continue to be valid after 24 March 2020.

* As of 24 March 2020, Airworthiness reviews for light aircraft not used by licensed air carriers shall be performed in accordance with Subpart I of Part-ML
* EASA Form 15c becomes extendable and corresponding extension have to be carried out in accordance with ML.A.901(c).

**Continuing Airworthiness of aircraft following Part-ML**

* AMP of Part-ML aircraft shall be developed iaw ML.A.302. These AMP are no longer approved by the competent authority. They are approved by the CAMO or CAO (or declared by the owner if no CAMO/CAO is contracted). A new privilege of AMP approval is added in this respect to Part-MG organisations (M.A.711(a)(5)).

Note: existing AMPs approved in compliance with M.A.302 before 24 March 2020 continue to be valid after 24 March 2020.

* Defect management shall be performed according to ML.A.403 (there are alleviations).
* AMP development privilege for ELA2 aircraft not used in commercial operation is removed from Part-M Subpart F and Part-145. Concerned organisations are no longer allowed to process AMPs.

## Appendix II — Part-CAMO vs Part-MG Correspondence table and transition oversight policy

| **Potential transition findings are identified un blue**  |
| --- |
| **Part-M subpart G requirement where applicable** | **Part-CAMO requirement** | **Oversight policy to be applied to grandfathered Part-CAMO from 24 March 2020 to 24 September 2021** |
| M.A.702 - Application | CAMO.A.115 – Application for an organisation certificate | In case of non-compliance with CAMO.A.115(a)/(b)(2), an oversight finding should be raised and managed i.a.w. CAMO.B.350.CAMO.A.115(b)(1) is a new requirement for the organisation to provide the results of a pre-audit against the applicable requirements together with its application. When the organisation is grandfathered to Part-CAMO, provision of the result of that pre-audit is not mandatory at the time the Part-CAMO certificate is issued. If not already in place, the organisation should provide the competent authority with a procedure describing how changes not requiring prior approval will be managed and notified to the competent authority before 24 September 2021 (refer to CAMO.A.130). |
| N/A – New requirement introduced by Part-CAMO | CAMO.A.120 – Means of compliance | Potential transition finding if the organisation intends to use AltMoC: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition does not contain appropriate provisions to address CAMO.A.120 requirements”. |
| M.A.703 – Extend of approval | CAMO.A.125(a)/(b)/(c) – Terms of approval and privileges of the organisation | In case of non-compliance with CAMO.A.125(a)/(b)/(c), an oversight finding should be raised and managed i.a.w. CAMO.B.350.CAMO.A.125 covers both M.A.703 and M.A.711 requirements (refer to the line dedicated to M.A.711), M.A.711 ‘Privileges of the organisation’ is incorporated (new points (d) to (f)) and relevant references updated. Only minor changes are made to the text stemming from M.A.711 to update the cross references and replace ‘quality system’ with ‘management system’. The text is further amended to include the Part-M/Part-ML references for the extension of the ARC (cf. point (d)(4)) and for the issue of a recommendation for the airworthiness review by the competent authority (cf. point (e)(2)). |
| M.A.711 – Privileges of the organisation | CAMO.A.125(d)/(e)/(f) – Terms of approval and privileges of the organisation | In case of non-compliance with CAMO.A.125(d)/(e)/(f), an oversight finding should be raised and managed i.a.w. CAMO.B.350. |
| M.A.713 – Changes to the approved continuing airworthiness organisation | CAMO.A.130 – Changes to the organisation | Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition does not contain necessary provisions to address CAMO.A.130 requirements”.CAMO.A.130 introduces the term ‘changes not requiring prior approval’ replacing the ‘indirect approval’. Changes not requiring prior approval will be managed as agreed between the organisation and the authority. The organisation should amend current exposition to account for CAMO.A.130 before 24 September 2021. Until the organisation is fully compliant with Part-CAMO changes to the organisation should be managed i.a.w. the organisation current approved procedure. As a result, in case of non-compliance with M.A.713 and/or with the current procedure in place within the organisation, an oversight finding should be raised and managed i.a.w. CAMO.B.350.  |
| M.A.715 – Continued validity of approval | CAMO.A.135 – Continued validity | Changes are made to update references and for consistency throughout the new Part-CAMO.In case of non-compliance with CAMO.A.135, an oversight finding should be raised and managed i.a.w. CAMO.B.350. |
| N/A – New requirement introduced by Part-CAMO | CAMO.A.140 - Access | A new CAMO.A.140 Access is added. It contains the requirements for granting access to the competent authority for the purpose of determining continued compliance.In case of non-compliance with CAMO.A.140, an oversight finding should be raised and managed i.a.w. CAMO.B.350 as this requirement was already existing in point (a)(2) of M.A.715 and is therefore not considered as a novelty. |
| M.A.716 - Findings | CAMO.A.150 – Findings | Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition procedure is not compliant with CAMO.A.150(a)(1)”.CAMO.A.150 add a requirement to identify the root causes of and contributing factors to the non-compliance. The organisation should amend current exposition to account for CAMO.A.150(a)(1) before 24 September 2021.In case of non-compliance with CAMO.A.150(a)(2)/(a)(3)/(b), an oversight finding should be raised and managed i.a.w. CAMO.B.350. |
| N/A –not explicit requirement in Part-MG | CAMO.A.155 – Immediate reaction to a safety problem | Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition procedure is not compliant with CAMO.A.155”.CAMO.A.155 add a new requirement to implement any safety measures mandated by the competent authority and any relevant mandatory safety information issued by the Agency. Even if newly formally introduced through CAMO.A.155, this requirement is not considered as a novelty and apart from the case of the exposition update to account for that new article (refer to above transition finding), in case of non-compliance with CAMO.A.155, an oversight finding should be raised and managed i.a.w. CAMO.B.350. |
| N/A – Previous M.A.202 requirement transferred into Part‑CAMO | CAMO.A.160 – Occurrence reporting | A new CAMO.A.160 Occurrence reporting is added to introduce the occurrence reporting requirements applicable to CAMOs. As similar M.A.202 requirement applied to Part-MG organisation, CAMO.A.160 is not considered as a novelty and in case of non-compliances with CAMO.A.160, an oversight finding should be raised and managed i.a.w. CAMO.B.350. |
| M.A.712 – Quality system | CAMO.A.200 – Management system | Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition procedure is not compliant with CAMO.A.200(a)(2)/(a)(3)/(a)(5)”.The organisation should amend current exposition quality system procedure to account for CAMO.A.200 and CAMO.A.202. Main novelties compared to M.A.712 are:* CAMO.A.200(a)(2): Safety policy.
* CAMO.A.200(a)(3): identification of aviation safety hazards and management of associated risks.
* CAMO.A.200(a)(5): documentation of all management system key processes.

In case of non-compliance with CAMO.A.200(a)(1)/(a)(4)/(a)(6)/(a)(7)/(b)/(c)/(d) an oversight finding should be raised and managed i.a.w. CAMO.B.350. |
| CAMO.A.202 – Internal safety reporting scheme | Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition does not contain necessary provisions to address CAMO.A.160 requirements”.A new CAMO.A.202 Internal safety reporting scheme is added to establish an internal reporting scheme supporting the organisation’s hazard identification and safety risk management processes and fostering its safety culture. The internal reporting scheme shall also be accessible to organisations working under the CAMO’s management system. It also forms the basis for establishing mandatory and voluntary occurrence reporting as required by Regulation (EU) No 376/2014.The organisation should amend its procedures to account for CAMO.A.202 before 24 September 2021. |
| N/A - New requirement introduced in Part-CAMO | CAMO.A.205 – Contracting and subcontracting | Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition procedure is not compliant with CAMO.A.205(a)(2)”.A new CAMO.A.205 Contracting and subcontracting is added to clarify the responsibility of the CAMO to ensure that any contracting (maintenance) or subcontracting (specific continuing-airworthiness-management-related activities) complies with applicable requirements. In this context it is important to clarify that the term ‘subcontracting’ covers cases where the contracted organisation is itself Part-CAMO or Part-CAO approved and cases where such organisation is not Part-CAMO/Part-CAO approved. Any continuing-airworthiness-management related services provided by third parties are to be considered ‘subcontracting under the management system’ for the purpose of Part-CAMO.The organisation should amend current exposition to account for CAMO.A.205(a)(2) before 24 September 2021.In case of non-compliance with CAMO.A.205(a)(1)(b), an oversight finding should be raised and managed i.a.w. CAMO.B.350. |
| M.A.705 - Facilities | CAMO.A.215 - Facilities | In case of non-compliance with CAMO.A.215, an oversight finding should be raised and managed i.a.w. CAMO.B.350 |
| M.A.714(a)(1)/(a)(3)/(a)(4)/(a)(5)/(a)(6)/(f)/(e) – Records-keeping | CAMO.A.220(a)(1)/(a)(3)/(a)(4)/(a)(6)/(d)/(f) – Records-keeping  | In case of non-compliance with CAMO.A.220(a)(1)/(a)(3)/(a)(4)/(a)(6)/(d)/(f), an oversight finding should be raised and managed i.a.w. CAMO.B.350.The record-keeping duration for aircraft related records is changed to 3 years after the responsibility for the aircraft has been permanently transferred, to align with the validity of the airworthiness review certificate (ARC) and 1 year for aircraft permanently withdrawn from service.In addition, record keeping duration for personnel records is 3 years after a person has left the organisation. This will ensure that for any ARC issued, personnel records will remain accessible for the entire ARC validity, including in the case a person has left the CAMO shortly after an ARC was issued. |
| N/A – New requirement introduced by Part-CAMO | CAMO.A.220(a)(2)/(a)(5)/(b)/(e) – Records-keeping | Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition is not compliant with CAMO.A.220(a)(2)/(a)(5)/(b)/(e)”.CAMO.A.220 Record-keeping includes management-system-. A record-keeping duration of 5 years for management-system-related records is introduced (the same record-keeping duration applies in the area of Aircrew and Air Operations). In addition, the organisation shall record all details of work carried out and the format of the records shall be specified in the organisation’s manual. |
| M.A.706(h) – Personnel M.A.707(e) – Airworthiness Review Staff | CAMO.A.220(c) – Records-keeping | Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition is not compliant with CAMO.A.220(c)”.CAMO.A.220 Record-keeping includes personnel related record-keeping. Personnel-related records (qualification and experience) shall include personnel involved in safety management and be kept until 3 years after a person has left the organisation.  |
| M.A.707(e) – Airworthiness Review Staff | CAMO.A.220(c)(1)(ii)/(2)/(3) – Records-keeping | In case of non-compliance with CAMO.A.220(c)(1)(ii)/(c)(2)/(c)(3), an oversight finding should be raised and managed i.a.w. CAMO.B.350 except if corresponding records have been kept for only 2 years. |
| M.A.704 – Continuing airworthiness management exposition | CAMO.A.300 – Continuing airworthiness management exposition | Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition is not compliant with CAMO.A.300”.CAMO.A.300 include additional management-system-related elements, such as: * the safety policy,
* a description of the internal safety reporting scheme (CAMO.A.202),
* a general description of how the organisation ensures availability of staff (CAMO.A.305(d)),
* a procedure defining the scope of changes not requiring prior approval and describing how such changes will be managed and notified (CAMO.A.115(b) and CAMO.A.130(c)), the procedures specifying how the organisation controls any contracted or subcontracted tasks, including contracted maintenance (CAMO.A.315(c)),
* a list of currently approved alternative means of compliance and, if any, a procedure to issue an AltMOC.
* The compliance statement in point (a)(1) is amended to cover all Part-M, Part-ML, and Part-CAMO requirements, as applicable.
* In point (a)(11) additional clarification is provided on the procedures required specifying how the organisation ensures compliance with Part-CAMO, Part-M and Part-ML.
* In point (a)(9), now (a)(12), the requirement for a list of approved maintenance programmes is clarified, by stating this is only relevant for aircraft for which a contract exists for continuing airworthiness management, not being required for initial approval of the CAMO. Accordingly, baseline and generic maintenance programmes are no longer required (see also CAMO.A.325).
* Point (b) is reviewed to specify that the initial CAME is subject to competent authority approval.
* A requirement to maintain the CAME to remain an up-to-date description of the organisation is also added.
* Point (c) on amendments to the CAME refers to the changes requiring prior approval (cf. CAMO.A.130(a)) and to the new provisions on managing changes without prior competent authority approval, based on an agreed procedure.

The organisation should amend current exposition to account for CAMO.A.300 . As long as the organisation is not fully compliant with Part-CAMO, any non-compliance with CAMO.A.300 should be classified as a transition finding with 21/08/2021as closure date except when there is a non-compliance with M.A.704 which should be classified i.a.w. CAMO.B.350. |
| M.A.706(a)/(b)/(c)/(d)/(e)/(f)/(g)/(i)/(j)/(k) – Personnel requirements(also M.A.712(a)) | CAMO.A.305(a)(1)/(a)(3)/(a)(4)/(a)(6)/(a)(7)/(b)/(c)/(d)/(e)/(f)/(g) – Personnel requirements | In case of non-compliance with CAMO.A.305(a)(1)/(a)(3)/(a)(4)/(a)(6)/(a)(7)/(b)/(c)/(d)/(e)/(f)/(g), an oversight finding should be raised and managed i.a.w. CAMO.B.350 **except if the non-compliance concerns understanding of safety management and human factors principles appropriate to the person’s function and responsibilities where a transition finding should be raised**. |
| N/A - New requirement introduced in Part-CAMO | CAMO.A.305(a)(2)/(a)(5) – Personnel requirements | Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition is not compliant with CAMO.A.305(a)(2)/(a)(5)”.* CAMO.A.305 includes the nomination of a person or group of persons for the compliance monitoring function and for safety-management related responsibilities, to clarify the responsibilities of the accountable manager, and to state that competence must include an understanding of the application of safety management and human factors principles and human performance issues.
* Additional changes are made to improve the overall structure of this IR and to clarify the link with Part-ORO. In particular, point (b)(1) states that for organisations also approved as licensed air carriers the accountable manager shall be the person appointed as accountable manager for the air carrier as required by point ORO.GEN.210(a) of Part-ORO. The requirement for a nominated postholder maintenance, included in point (b)(2), is aligned with Part-ORO (reference is made to ‘person responsible for the management and supervision of continuing airworthiness’).
* A requirement is added for a system to plan the availability of staff to ensure that the organisation has sufficient appropriately qualified staff to plan, perform, supervise, inspect and monitor its activities in accordance with the terms of approval (new point (d)).
* A new point (e) is added to include in CAMO.A.305 the reference to airworthiness review staff currently embedded in M.A.707 point (a). This way, CAMO.A.305 includes the requirements for all categories of staff and CAMO.A.310 may concentrate on airworthiness review staff qualification requirements.
 |
| M.A.707 – Airworthiness review staff | CAMO.A.310 – Airworthiness review staff qualification | In case of non-compliance with CAMO.A.310, an oversight finding should be raised and managed i.a.w. CAMO.B.350 **except if the non-compliance concerns understanding of safety management and human factors principles by Airworthiness Review Staff where a transition finding should be raised**.* M.A.707 point (j) on titles and names of persons to be kept updated in the CAME is deleted; this is already addressed in CAMO.A.300(a)(4).
* M.A.707 point (k) is amended to require that competence include an understanding of safety management and human factors principles appropriate to the person’s function and responsibilities in the organisation and to include a reference to personnel involved in airworthiness reviews or recommendations, and, if applicable, issuing permits to fly, to reflect the new point CAMO.A.305(e).
* specific qualification requirements not applicable within the scope of Part-CAMO are removed.
* Point (d) on listing airworthiness review staff in the CAME is deleted as this is already addressed in point CAMO.A.300(a)(7).
* These airworthiness review staff qualifications apply regardless of the aircraft managed, meaning for example that a Part-CAMO-approved organisation performing airworthiness reviews of aircraft other than CMPA may not use airworthiness review staff complying with the ‘lower’ requirements of the new Part-CAO.
 |
| M.A.708 – Continuing airworthiness management | CAMO.A.315 – Continuing airworthiness management | In case of non-compliance with CAMO.A.310, an oversight finding should be raised and managed i.a.w. CAMO.B.350 **except in case of non-compliance with CAMO.A.315(b)(4) (default in using the organisation’s safety risk management process) where a transition finding should be raised.** * CAMO.A.315 Continuing airworthiness management is reviewed to eliminate overlaps with M.A.301. The underlying principle is that purely technical requirements are included in Part-M and that Part-CAMO focuses on the related organisational responsibilities. This will improve consistency and facilitate future amendments.
* Additional changes are made to update relevant cross references. Point (c) is amended to update the reference to ‘CAT’ by ‘licensed air carriers in accordance with Regulation (EC) No 1008/2008’, and to include the consultation with the operator. As a Part-CAMO-approved organisation may also manage the continuing airworthiness of other than CMPA or of aircraft not used by licensed air carriers, references to Part-CAO organisations are added and references to Subpart F maintenance organisations are maintained (to allow for a smooth transition to Part-CAO, Subpart F will be maintained during the transition period).
* Point (e) is added to include a requirement for human factors principles and human performance limitations to be taken into account for any continuing airworthiness management tasks.
 |
| M.A.710 – Airworthiness review | CAMO.A.320 – Airworthiness review | In case of non-compliance with CAMO.A.320, an oversight finding should be raised and managed i.a.w. CAMO.B.350 The text of existing M.A.710 is replaced with a requirement to follow either Part-M Section A point M.A.901 or Part-ML Section A point ML.903, depending on the aircraft managed. The specific elements constituting the airworthiness review process are transferred to those Part-M and Part-ML IRs. |
| M.A.709 – Documentation | CAMO.A.325 – Continuing airworthiness management data | In case of non-compliance with CAMO.A.325, an oversight finding should be raised and managed i.a.w. CAMO.B.350. CAMO.A.325 Continuing airworthiness management data is changed for consistency to reflect the scope of the new Part-CAMO and to update the relevant cross references. Point (b) is deleted as the requirement to produce baseline or generic maintenance programmes is not maintained. |

## Appendix III — Part-CAO vs Part-MG Correspondence table and transition oversight policy

| **Potential transition findings are identified un blue** |
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| **Part-M subpart G requirement where applicable** | **Part-CAO requirement** | **Oversight policy to be applied to grandfathered Part-CAO from 24** **March** **2020 to 24** **September** **2021** |
| M.A.702 - Application | CAO.A.015 – Application for an organisation certificate | In case of non-compliance with CAO.A.015, an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| N/A – New requirement introduced by Part-CAO | CAO.A.017 – Means of compliance | Potential transition finding if the organisation intends to use AltMoC: “Due to on-going transition from Part-M subpart G to Part-CAO, current exposition does not contain appropriate provisions to address CAO.A.017 requirements”. |
| M.A.703 – Extend of approval | CAO.A.020 – Terms of approval | Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAO, current exposition is not compliant with CAO.A.020 requirements”.The above transition finding is meant to address format changes in the way the scope of work is described in the organisation manual. In case the grandfathered Part-CAO organisation uses privileges on aircraft/component that are out of its scope, an oversight finding should be raised against CAO.A.020. The organisation should amend its scope of work as specified by CAO.A.020 before 24 September 2021. |
| M.A.704 – Continuing airworthiness management exposition | CAO.A.025 – Combined airworthiness exposition | Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAO, current exposition is not compliant with CAO.A.025”.Structure of the CAE is as follows:* The CAE is made of the 4 following parts:
	+ Part A – General description
	+ Part B - General procedures
	+ Part C – Maintenance procedures
	+ Part D – Continuing airworthiness management procedures
	+ Part E – Supporting documents
* Organisation grandfathered as Part-CAO based on a Part-MG should prepare a CAE which covers Part A, Part B, Part D and Part E. To help the organisation in preparing the CAE based on existing exposition:
	+ A table comparing CAE with Part-MG exposition is available in annex 2-2, and
	+ A detailed table of content of the CAE along with CAO requirements to be covered by each section of the CAE is provided in AMC1 CAO.A.025.

The organisation should develop a CAE to account for CAO.A.025. As long as the organisation is not fully compliant with Part-CAO, any non-compliance with CAO.A.025 should be classified as a transition finding with 24 September 2021as closure date except when there is a non-compliance with M.A.704 which should be classified i.a.w. CAO.B.060. |
| M.A.705 - Facilities | CAO.A.030 - Facilities | In case of non-compliance with CAO.A.030, an oversight finding should be raised and managed i.a.w. CAO.B.060 |
| M.A.706 - Personnel requirements | CAO.A.035 – Personnel requirements | In case of non-compliance with CAO.A.035, an oversight finding should be raised and managed i.a.w. CAO.B.060 |
| M.A.707 – Airworthiness review staff | CAO.A.045 – Airworthiness review staff | In case of non-compliance with CAO.A.045, an oversight finding should be raised and managed i.a.w. CAO.B.060 |
| M.A.708(a)/(b) /(c)/(d) – Continuing airworthiness management | CAO.A.075(a)/(b)– Continuing airworthiness management | In case of non-compliance with CAO.A.075(a)/(b), an oversight finding should be raised and managed i.a.w. CAO.B.060.CAO.A.075 Continuing airworthiness management is reviewed to eliminate overlaps with M.A.301 and ML.A.301. The underlying principle is that purely technical requirements are included in Part-M and Part-ML and that Part-CAO focuses on the related organisational responsibilities. This will improve consistency and facilitate future amendments.  |
|  |  |  |
| M.A.709 – Documentation | CAO.A.080 – Continuing airworthiness management data | In case of non-compliance with CAO.A.080, an oversight finding should be raised and managed i.a.w. CAO.B.060 |
| M.A.710 – Airworthiness review | CAO.A.085 – Airworthiness review | In case of non-compliance with CAO.A.085, an oversight finding should be raised and managed i.a.w. CAO.B.060 The text of existing M.A.710 is replaced with a requirement to follow either Part-M Section A point M.A.901 or Part-ML Section A point ML.903, depending on the aircraft managed. The specific elements constituting the airworthiness review process are transferred to those Part-M and Part-ML IRs. |
| M.A.714 – Records-keeping | CAO.A.090(a)(2)/(a)(3)/(a)(4)/(c)/(d)/(e)/(f)/(g)(2) – Records-keeping  | In case of non-compliance with CAO.A.090(a)(2)/(a)(3)/(a)(4)/(c)/(d)/(e)/(f)/(g)(2), an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| M.A.711 – Privileges of the organisation | CAO.A.095(b)/(c)/(d)/(e) – Privileges of the organisation | In case of non-compliance with CAO.A.095(b)(1)/(b)(3)/(b)(4)/(c)/(d)/(e), an oversight finding should be raised and managed i.a.w. CAO.B.060. |
|  |  |  |
| M.A.712 – Quality system | CAO.A.100 – Quality system and organisational review | In case of non-compliance with CAO.A.100, an oversight finding should be raised and managed i.a.w. CAO.B.060.A Part-CAO can elect to replace its quality system by an organizational review when one of the following condition is met:* The scope of the CAO does only contain aircraft covered by Part-ML
* The CAO does not exceed 10 full-time equivalent staff involved in maintenance
* The CAO does not exceed 5 full-time equivalent staff involved in continuing airworthiness management
 |
| M.A.713 – Changes to the approved continuing airworthiness organisation | CAO.A.105 – Changes to the organisation | Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAO, current exposition does not contain necessary provisions to address CAO.A.105 requirements”.As opposed to Part-MG where approval of the exposition can optionally be performed through indirect approval, Part-CAO mandate the organisation to have a procedure to address changes not requiring prior approval. Changes not requiring prior approval will be managed as agreed between the organisation and the authority,. The organisation should develop a procedure to account for CAO.A.105 before 24 September 2021. Until the organisation is fully compliant with Part-CAO, changes to the organisation should be managed i.a.w. the organisation current approved procedure. As a result, in case of non compliance with M.A.713 and/or with the current procedure in place within the organisation, an oversight finding should be raised and managed i.a.w. CAO.B.060.  |
| M.A.715 – Continued validity of approval | CAO.A.110 – Continued validity | Minor changes are made to update references and for consistency throughout the new Part-CAO.In case of non-compliance with CAO.A.110, an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| M.A.716 - Findings | CAO.A.115 – Findings | In case of non-compliance with CAO.A.115, an oversight finding should be raised and managed i.a.w. CAO.B.060. |

## Appendix IV – Part-CAO vs Part-MF Correspondence table and transition oversight policy

| **Potential transition findings are identified un blue** |
| --- |
| **Part-M subpart F requirement where applicable** | **Part-CAO requirement** | **Oversight policy to be applied to grandfathered Part-CAO from 24** **March** **2020 to 24** **September** **2021** |
| M.A.602 - Application | CAO.A.015 – Application for an organisation certificate | In case of non-compliance with CAO.A.015, an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| N/A – New requirement introduced by Part-CAO | CAO.A.017 – Means of compliance | Potential transition finding if the organisation intends to use AltMoC: “Due to on-going transition from Part-M subpart F to Part-CAO, current manual does not contain appropriate provisions to address CAO.A.017 requirements”. |
| M.A.603 – Extend of approval | CAO.A.020 – Terms of approval | Potential transition finding: “Due to on-going transition from Part-M subpart F to Part-CAO, current manual is not compliant with CAO.A.020 requirements”.The above transition finding is meant to address format changes in the way the scope of work is described in the organisation manual. In case the grandfathered Part-CAO organisation uses privileges on aircraft/component that are out of its scope, an oversight finding should be raised against CAO.A.020. The organisation should amend its scope of work as specified by CAO.A.020 before 24 September2021.CAO.A.020(a)(3) introduces the following limitation: a CAO which employs only one person for both planning and carrying out of all maintenance tasks cannot hold privileges for the maintenance of:* aeroplanes equipped with a turbine engine (in the case of aircraft-rated organisations);
* helicopters equipped with a turbine engine or with more than one piston engine (in the case of aircraft-rated organisations);
* complete piston engines of 450 HP and above (in the case of engine-rated organisations); and
* complete turbine engines (in the case of engine-rated organisations).

Current Part-MF organisation being in one of the above situation cannot be grandfathered as a Part-CAO. |
| M.A.604 – Maintenance organisation manual | CAO.A.025 – Combined airworthiness exposition | Potential transition finding: “Due to on-going transition from Part-M subpart F to Part-CAO, current manual is not compliant with CAO.A.025”.Structure of the CAE is as follows:* The CAE is made of the 4 following parts:
	+ Part A – General description
	+ Part B - General procedures
	+ Part C – Maintenance procedures
	+ Part D – Continuing airworthiness management procedures
	+ Part E – Supporting documents
* Organisation grandfathered as Part-CAO based on a Part-MF should prepare a CAE which covers Part A, Part B, Part C and Part E. To help the organisation in preparing the CAE based on existing manual:
	+ A table comparing CAE with Part-MF manual is available in annex 3-2, and
	+ A detailed table of content of the CAE along with CAO requirements to be covered by each section of the CAE is provided in AMC1 CAO.A.025.

The organisation should develop a CAE to account for CAO.A.025. As long as the organisation is not fully compliant with Part-CAO, any non-compliance with CAO.A.025 should be classified as a transition finding with 24 September 2021as closure date except when there is a non compliance with M.A.604 which should be classified i.a.w. CAO.B.060. |
| M.A.605 - Facilities | CAO.A.030 - Facilities | In case of non-compliance with CAO.A.030, an oversight finding should be raised and managed i.a.w. CAO.B.060 |
| M.A.606(a)/(b)/(c)/(d)/(e)/(f) - Personnel requirements | CAO.A.035 – Personnel requirements | In case of non-compliance with CAO.A.035, an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| M.A.606(g)/(h) – Personnel requirements | CAO.A.040(c) – Certifying staff | In case of non-compliance with CAO.A.040(c), an oversight finding should be raised and managed i.a.w. CAO.B.060 |
| M.A.607 – Certifying staff and airworthiness review staff | CAO.A.040(a)/(b)/(d) – Certifying staff | In case of non-compliance with CAO.A.040(a)(b)(d), an oversight finding should be raised and managed i.a.w. CAO.B.060 |
| M.A.606(i) – Personnel requirements | CAO.A.045 – Airworthiness review staff | In case of non-compliance with CAO.A.045, an oversight finding should be raised and managed i.a.w. CAO.B.060.Requirements contained in CAO.A.045 are different from M.A.606(i) (as amended by Reg. (EU) 2020/XXXX and coming from the former M.A.901(l)(1)) but are not considered as novelties. |
| M.A.608 – Components, equipment and tools | CAO.A.050 – Components, equipment and tools | In case of non-compliance with CAO.A.050, an oversight finding should be raised and managed i.a.w. CAO.B.060.CAO.A.050(b) requires the organisation to have a procedure to ensure that it has access to all equipment and tools necessary to carry out its work, used only on an occasional basis. |
| M.A.609 – Maintenance data | CAO.A.055(a) – Maintenance data and work orders | In case of non-compliance with CAO.A.055(a), an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| M.A.610 – Maintenance work orders | CAO.A.055(b) – Maintenance data and work orders | In case of non-compliance with CAO.A.055(b), an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| M.A.611 – Maintenance standards | CAO.A.060 – Maintenance standards | In case of non-compliance with CAO.A.060, an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| M.A.612 – Certificate of release to service | CAO.A.065 – Aircraft certificate of release to service | In case of non-compliance with CAO.A.065, an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| M.A.613 – Component certificate of release to service | CAO.A.070 – Component certificate of release to service | In case of non-compliance with CAO.A.070, an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| M.A.609 – Documentation | CAO.A.080 – Continuing airworthiness management data | In case of non-compliance with CAO.A.080, an oversight finding should be raised and managed i.a.w. CAO.B.060 |
| M.A.615(e) – Privileges of the organisation | CAO.A.085 – Airworthiness reviewCAO.A.095(c)(2) - Privileges of the organisation | In case of non-compliance with CAO.A.085, an oversight finding should be raised and managed i.a.w. CAO.B.060  |
| M.A.614 – Maintenance and airworthiness review records | CAO.A.090– Records-keeping  | In case of non-compliance with CAO.A.090, an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| M.A.615(a)/(b)/(c)/(d) – Privileges of the organisation | CAO.A.095(a)(1)/(a)(2)/(a)(3)/(a)(4)/(c)(2)/(d) – Privileges of the organisation | In case of non-compliance with CAO.A.095(a)(1)/(a)(2)/(a)(3)/(a)(4)/(c)(2)/(d), an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| M.A.616 – Organisational review | CAO.A.100(f) – Quality system and organisational review | In case of non-compliance with CAO.A.100(f), an oversight finding should be raised and managed i.a.w. CAO.B.060.A Part-CAO can elect to replace its quality system by an organisational review when one of the following condition is met:* The scope of the CAO does only contain aircraft covered by Part-ML
* The CAO does not exceed 10 full-time equivalent staff involved in maintenance
* The CAO does not exceed 5 full-time equivalent staff involved in continuing airworthiness management
 |
| M.A.617 – Changes to the approved continuing airworthiness organisation | CAO.A.105 – Changes to the organisation | Potential transition finding: “Due to on-going transition from Part-M subpart F to Part-CAO, current manual does not contain necessary provisions to address CAO.A.105 requirements”.As opposed to Part-MF where approval of the manual can optionally be performed through indirect approval, Part-CAO mandate the organisation to have a procedure to address changes not requiring prior approval. Changes not requiring prior approval will be managed as agreed between the organisation and the authority. The organisation should develop a procedure to account for CAO.A.105 before 24 September 2021. Until the organisation is fully compliant with Part-CAO, changes to the organisation should be managed i.a.w. the organisation current approved procedure. As a result, in case of non-compliance with M.A.617 and/or with the current procedure in place within the organisation, an oversight finding should be raised and managed i.a.w. CAO.B.060.  |
| M.A.618 – Continued validity of approval | CAO.A.110 – Continued validity | Minor changes are made to update references and for consistency throughout the new Part-CAO.In case of non-compliance with CAO.A.110, an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| M.A.619 - Findings | CAO.A.115 – Findings | In case of non-compliance with CAO.A.115, an oversight finding should be raised and managed i.a.w. CAO.B.060. |

## Appendix V – Part-CAO vs Part-145 Correspondence table and transition oversight policy

| **Potential transition findings are identified un blue** |
| --- |
| **Part-145 requirement where applicable** | **Part-CAO requirement** | **Oversight policy to be applied to grandfathered Part-CAO from 24** March **2020 to 24** September **2021** |
| 145.A.15 - Application | CAO.A.015 – Application for an organisation certificate | In case of non-compliance with 145.A.15, an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| N/A – New requirement introduced by Part-CAO | CAO.A.017 – Means of compliance | Potential transition finding if the organisation intends to use AltMoC: “Due to on-going transition from Part-145 to Part-CAO, current exposition does not contain appropriate provisions to address CAO.A.017 requirements”. |
| 145.A.20 – Terms of approval | CAO.A.020 – Terms of approval | Potential transition finding: “Due to on-going transition from Part-145 to Part-CAO, current exposition is not compliant with CAO.A.020 requirements”.The above transition finding is meant to address format changes in the way the scope of work is described in the organisation manual. In case the grandfathered Part-CAO organisation uses privileges on aircraft/component that are out of its scope, an oversight finding should be raised against CAO.A.020. The organisation should amend its scope of work as specified by CAO.A.020 before 24 September 2021.CAO.A.020(a)(3) introduces the following limitation: a CAO which employs only one person for both planning and carrying out of all maintenance tasks cannot hold privileges for the maintenance of:* aeroplanes equipped with a turbine engine (in the case of aircraft-rated organisations);
* helicopters equipped with a turbine engine or with more than one piston engine (in the case of aircraft-rated organisations);
* complete piston engines of 450 HP and above (in the case of engine-rated organisations); and
* complete turbine engines (in the case of engine-rated organisations).

Current Part-145 organisation being in one of the above situation cannot be grandfathered as a Part-CAO. |
| 145.A.70 – Maintenance organisation exposition | CAO.A.025 – Combined airworthiness exposition | Potential transition finding: “Due to on-going transition from Part-145 to Part-CAO, current exposition is not compliant with CAO.A.025”.Structure of the CAE is as follows:* The CAE is made of the 4 following parts:
	+ Part A – General description
	+ Part B - General procedures
	+ Part C – Maintenance procedures
	+ Part D – Continuing airworthiness management procedures
	+ Part E – Supporting documents
* Organisation grandfathered as Part-CAO based on a Part-145 should prepare a CAE which covers Part A, Part B, Part C and Part E. To help the organisation in preparing the CAE based on existing manual:
	+ A table comparing CAE with Part-145 exposition is available in annex 4-2, and
	+ A detailed table of content of the CAE along with CAO requirements to be covered by each section of the CAE is provided in AMC1 CAO.A.025.

The organisation should develop a CAE to account for CAMO.A.025. As long as the organisation is not fully compliant with Part-CAO, any non-compliance with CAO.A.025 should be classified as a transition finding with 24 September 2021as closure date except when there is a non-compliance with 145.A.70 which should be classified i.a.w. CAO.B.060. |
| 145.A.25 - Facilities | CAO.A.030 – FacilitiesCAO.A.060(b)/(f) – Maintenance standards | In case of non-compliance with CAO.A.030 or CAO.A.060(b)/(f), an oversight finding should be raised and managed i.a.w. CAO.B.060 |
| 145.A.30(a)/(b)/(d)/(e)/(f) - Personnel requirements | CAO.A.035 – Personnel requirements | In case of non-compliance with CAO.A.035, an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| 145.A.30(g)/(h)/(i)/(j)(3)/(j)(4)/(j)(5) – Personnel requirements | CAO.A.040(a)/(b)/(c) – Certifying staffCAO.A.060(a) – Maintenance standards | In case of non-compliance with CAO.A.040 or CAO.A.060(a), an oversight finding should be raised and managed i.a.w. CAO.B.060.Provisions given by 145.A.30(j)(1)/(j)(2) are not available in Part-CAO. |
| 145.A.30(k) – Personnel requirements | CAO.A.045(a)/(b)/(c)/(d) – Airworthiness review staff | In case of non-compliance with CAO.A.045, an oversight finding should be raised and managed i.a.w. CAO.B.060.Requirements contained in CAO.A.045 are different from 145.A.30(k) (as amended by Reg. (EU) 2020/XXXX and coming from the former M.A.901(l)(1)) but are not considered as novelties. |
| 145.A.35(j) – Certifying staff and support staff | CAO.A.040(d) – Certifying staff | In case of non-compliance with CAO.A.040(d), an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| 145.A.35(a)/(b)/(c)/(d)/(e)/(f)/(g)/(h)/(i)/(k)/(l)/(m)/(n)/(o) – Certifying staff and support staff | N/A – No equivalent requirement in Part-CAO | In Part-CAO there is no “base” and “line” maintenance and therefore there is no “support staff” vs “certifying staff”. As stated in CAO.A.040, Certifying staff shall exercise their privileges to release maintenance if the CAO has ensured:* that these certifying staff meet the requirements of point (b) of point 66.A.20 of Annex III (Part-66) except when paragraph 6 of Article 5 refers to a national regulation of a Member State, in which case, they shall meet the requirements of such a regulation;
* that these certifying staff have an adequate understanding of the relevant aircraft or aircraft component(s) to be maintained, or both, as well as of the organisation procedures required to perform such maintenance.

In case of open non-compliance against 145.A.35(a)(b)(c)(d)(e)(f)(g)(h)(i)(k)(l)(m)(n)(o) when the organisation is grandfathered as a Part-CAO, compliance against CAO.A.040 should be evaluated and if the situation is compliant with CAO.A.040, the finding should be cancelled. |
| 145.A.36 – Records of airworthiness review staff | CAO.A.045(e) – Airworthiness review staff | In case of non-compliance with CAO.A.045(d), an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| 145.A.40 – Equipment and tools | CAO.A.050(a)/(b) – Components, equipment and toolsCAO.A.060(d) – Maintenance standard | In case of non-compliance with CAO.A.050(a)/(b) or CAO.A.060(d), an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| 145.A.42 – Components | CAO.A.050(c) – Components, equipment and tools | In case of non-compliance with CAO.A.050(c), an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| 145.A.45(a)/(b)/(e)/(f)/(g) – Maintenance data145.A.48(d) – Performance of maintenance | CAO.A.055(a)/(b) – Maintenance data and work ordersCAO.A.060(c)/(e)/(j) – Maintenance standard | In case of non-compliance with CAO.A.055(a) or CAO.A.060(c)/(e)/(j), an oversight finding should be raised and managed i.a.w. CAO.B.060.* 145.A.45(b) requirement are applicable to Part-CAO organisation through a reference to M.A.401 and ML.A.401.
* There is no requirement equivalent to 145.A.45(c)/(d) in Part-CAO
 |
| 145.A.45(c)/(d) – Maintenance data | N/A – No equivalent requirement in Part-CAO | Open findings against 145.A.45(c)(d) at the time of grandfathering should be cancelled. |
| 145.A.65(b)(1) – Safety and quality policy, maintenance procedures and quality system | CAO.A.055(b) – Maintenance data and work orders | In case of non-compliance with CAO.A.055(b), an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| 145.A.47 – Production planning | N/A – No equivalent requirement in Part-CAO | There is no requirement to produce and maintain a production planning as required by 145.A.47 in Part-CAO. However; as mention in CAO.A.035(d), the CAO shall demonstrate having sufficient appropriately qualified staff for it to be able to carry out the planned work |
| 145.A.48(a)/(b)/(c) – Performance of maintenance | CAO.A.060(g)/(h)/(i) – Maintenance standards | In case of non-compliance with CAO.A.060(g)/(h)/(i), an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| 145.A.50(a)/(b)/(c)/(e)/(f) – Certification of maintenance | CAO.A.065 – Aircraft certificate of release to service | In case of non-compliance with CAO.A.065, an oversight finding should be raised and managed i.a.w. CAO.B.060.Aircraft release to service requirement are different in Part-CAO compared to Part-145 (no need of “C” licensed staff, no difference between “base” and “line” maintenance, etc. Even if the organisation complies with Part-145 and CAO.A.065, the release to service procedure needs to be amended to account for these changes. |
| 145.A.50(d) – Certification of maintenance | CAO.A.070 – Component certificate of release to service | In case of non-compliance with CAO.A.070, an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| 145.A.75(f) – Privileges of the organisation | CAO.A.085 – Airworthiness reviewCAO.A.095(c)(2) - Privileges of the organisation | In case of non-compliance with CAO.A.085, an oversight finding should be raised and managed i.a.w. CAO.B.060  |
| 145.A.55 – Maintenance and airworthiness review records | CAO.A.090(a)(1)/(a)(3)/(b)/(c)/(d)/(e)/(f)/(g)(1) – Record-keeping | In case of non-compliance with CAO.A.090(a)(1)/(a)(3)/(b)/(c)/(d)/(e)/(f)/(g)(1), an oversight finding should be raised and managed i.a.w. CAO.B.060 |
| 145.A.75(a)/(b)/(c)/(d)/(e) – Privileges of the organisation | CAO.A.095(a)(1)/(a)(2)/(a)(3)/(a)(4)/(d) – Privileges of the organisation | In case of non-compliance with CAO.A.095(a)(1)/(a)(2)/(a)(3)/(a)(4)/(d), an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| 145.A.65(a)/(b)(2)/(c) – Safety and quality policy, maintenance procedures and quality system | CAO.A.100 – Quality system and organisational review | In case of non-compliance with CAO.A.100, an oversight finding should be raised and managed i.a.w. CAO.B.060.A Part-CAO can elect to replace its quality system by an organisational review when one of the following condition is met:* The scope of the CAO does only contain aircraft covered by Part-ML
* The CAO does not exceed 10 full-time equivalent staff involved in maintenance
* The CAO does not exceed 5 full-time equivalent staff involved in continuing airworthiness management
 |
| 145.A.85 – Changes to the approved continuing airworthiness organisation | CAO.A.105 – Changes to the organisation | Potential transition finding: “Due to on-going transition from Part-145 to Part-CAO, current exposition does not contain necessary provisions to address CAO.A.105 requirements”.As opposed to Part-145 where approval of the exposition can optionally be performed through indirect approvals, Part-CAO mandate the organisation to have a procedure to address changes not requiring prior approval. Changes not requiring prior approval will be managed as agreed between the organisation and the authority. The organisation should develop a procedure to account for CAO.A.105 before 24 September 2021. Until the organisation is fully compliant with Part-CAO, changes to the organisation should be managed i.a.w. the organisation current approved procedure. As a result, in case of non compliance with 145.A.85 and/or with the current procedure in place within the organisation, an oversight finding should be raised and managed i.a.w. CAO.B.060.  |
| 145.A.90 – Continued validity of approval | CAO.A.110 – Continued validity | Minor changes are made to update references and for consistency throughout the new Part-CAO.In case of non-compliance with CAO.A.110, an oversight finding should be raised and managed i.a.w. CAO.B.060. |
| 145.A.95 - Findings | CAO.A.115 – Findings | In case of non-compliance with CAO.A.115, an oversight finding should be raised and managed i.a.w. CAO.B.060. |

## Appendix VI — Comparison CAE with Part-145 MOE

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Chapter | Description | Implementing rule reference | MOE chapter | MOE chapter description |
| **PART A – GENERAL DESCRIPTION** |  |  |
| A.1 | Statement by accountable manager | CAO.A.025(a)(1); CAO.A.035(a) | 1.1 | Corporate commitment by the accountable manager |
| A.2 | General presentation of the organisation | CAO.A.035(a); CAO.A.100(e) | 0 | GENERAL ORGANISATION (Operators within the European Union) |
| A.3 | Description and location of the facilities | CAO.A.025(a)(9); CAO.A.030 | 1.8 | General description of the facilities at each address intended to be approved |
| 5.3 | List of Line maintenance locations as per 145.A.75(d) |
| A.4 | Scope of work | CAO.A.020(a); CAO.A.025(a)(2); CAO.A.095(e); Appendix I point (a) | 1.9 | Organisations intended scope of work |
| A.5 | Exposition amendments and changes to the organisation | CAO.A.025(a)(11)/(c); CAO.A.105 | 1.10 | Notification procedure to the competent authority regarding changes to the organisation’s activities/approval/location/personnel |
| 1.11 | Exposition amendment procedures including, if applicable, delegated procedures |
| A.6 | Procedure for alternative means of compliance | CAO.A.017 |  |  |
| A.7 | Management personnel | CAO.A.025(a)(3); CAO.A.035(b); CAO.A.100(a) | 1.3 | Management personnel |
| 1.4 | Duties and responsibilities of the management personnel |
| A.8 | Organisation chart | CAO.A.025(a)(4) | 1.5 | Management organisation chart |
| A.9 | Manpower resources | CAO.A.035(d) | 1.7 | Manpower resources |
| 2.22\* | Control of manhour planning versus scheduled maintenance work |
| 2.28\* | Production planning procedures |
| A.10 | List of certifying staff | CAO.A.025(a)(5) | 1.6 | List of certifying staff, support staff and airworthiness review staff |
| A.11 | List of staff responsible for the development and approval of AMP | CAO.A.025(a)(6) |  |  |
| A.12 | List of airworthiness review staff | CAO.A.025(a)(7); CAO.A.045(d) | 1.6 | List of certifying staff, support staff and airworthiness review staff |
| A.13 | List of staff responsible for the issuance of permits to fly | CAO.A.025(a)(8) |  |  |
| **PART B – GENERAL PROCEDURES** |  |  |
| B.1 | Quality (or organisational review) system | CAO.A.100(a)/(b)/(d)/(e)/(f) | 1.2\* | Safety and quality policy |
| 3.3 | Quality audit remedial action procedure |
|  |  |
| 3.10 | Concession control for deviation from organisations’ procedures |
| 3.12 | Control of manufacturers’ and other maintenance working teams |
| B.2 | Audit plan (or frequency and content of organisational review) | CAO.A.100(b)/(f) | 3.1 | Quality audit of organisation procedures |
| 3.2 | Quality audit of aircraft |
| B.3 | Monitoring of maintenance contracts | CAO.A.100(b)(2) | 2.10 | Aircraft maintenance programme compliance |
| 2.11 | Airworthiness directives procedure |
| 3.9 | Aircraft or aircraft component maintenance tasks exemption process control |
| B.4 | Qualification, assessment and training of staff | CAO.A.035(c)/(d)/(e)/(f); CAO.A.040(a); CAO.A.045(a)/(b)/(c); CAO.A.060(a) | 3.4 | Certifying staff and support staff qualification and training procedures |
| 3.6 | Quality audit personnel |
| 3.7 | Qualifying inspectors |
| 3.8 | Qualifying mechanics |
| 3.11 | Qualification procedure for specialised activities such as NDT welding, etc. |
| 3.13\* | Human factors training procedure |
| 3.14 | Competence assessment of personnel |
| 3.15 | Training procedures for on-the-job training as per Section 6 of Appendix III to Part-66 (limited to the case where the competent authority for the Part-145 approval and for the Part-66 licence is the same). |
| 3.16 | Procedure for the issue of a recommendation to the competent authority for the issue of a Part-66 licence in accordance with 66.B.105 (limited to the case where the competent authority for the Part-145 approval and for the Part-66 licence is the same). |
| B.5 | One-off certification authorisation | CAO.A.040(b) |  |  |
| B.6 | Limited certification authorisation | CAO.A.040(c) |  |  |
| B.7 | Subcontracting | CAO.A.095(a)(2)/(b)(3); CAO.A.100(f) | 2.1 | Supplier evaluation and subcontract control procedure |
| B.8 | Maintenance data and continuing airworthiness management data | CAO.A.055(a); CAO.A.080 | 2.8 | Maintenance instructions and relationship to aircraft/aircraft component manufacturers’ instructions including updating and availability to staff |
| 2.13 | Maintenance documentation in use and its completion |
| 2.27 | Procedures for notification of maintenance data inaccuracies and ambiguities, to the type certificate holder |
| B.9 | Records management and retention | CAO.A.035(e); CAO.A.040(d); CAO.A.045(e); CAO.A.050(b); CAO.A.060(j); CAO.A.075(a)/(b)(9); CAO.A.090; CAO.A.100(c); CAO.A.085 | 2.13 | Maintenance documentation in use and its completion |
| 2.14 | Technical record control |
| 2.17 | Records for the operator |
| 2.21 | Control of computer maintenance record systems |
| 2.29 | Airworthiness review procedures and records for ELA1 aircraft not involved in commercial operations |
| L2.4 | Line procedure for completion of technical log |
| 3.5 | Certifying staff and support staff records |
| 4.2 | Operator procedures and paperwork |
| 4.3 | Operator record completion |
| 6 | OPERATORS MAINTENANCE PROCEDURES |
| B.10 | Carrying out the airworthiness review | CAO.A.085; CAO.A.095(c) | 2.29 | Airworthiness review procedures and records for ELA1 aircraft not involved in commercial operations |
| B.11 | Conformity with approved flight conditions | CAO.A.095(d) |  |  |
| B.12 | Issue of the permit to fly | CAO.A.095(d); CAO.A.045(a) |  |  |
| **PART C – MAINTENANCE PROCEDURES** |  |  |
| C.1 | Maintenance - general | CAO.A.025(10) | 2.26\* | Shift/task handover procedures |
| 3.12 | Control of manufacturers’ and other maintenance working teams |
| C.2 | Work order acceptance | CAO.A.055(b) | 4.1 | Contracting operators |
| 6 | OPERATORS MAINTENANCE PROCEDURES |
| C.3 | Components, equipment, tools and material (supply, acceptance, segregation, storage, calibration…) | CAO.A.050; CAO.A.060(d); CAO.A.030(b) | 2.1 | Supplier evaluation and subcontract control procedure |
| 2.2 | Acceptance/inspection of aircraft components and material from outside contractors |
| 2.3 | Storage, tagging and release of aircraft components and material to aircraft maintenance |
| 2.4 | Acceptance of tools and equipment |
| 2.5 | Calibration of tools and equipment |
| 2.19 | Return of defective aircraft components to store |
| 2.20 | Defective components to outside contractors |
| L2.1 | Line maintenance control of aircraft components, tools, equipment, etc. |
| L2.5 | Line procedure for pooled parts and loan parts |
| L2.6 | Line procedure for return of defective parts removed from aircraft |
| C.4 | Maintenance facility (selection, organisation, cleanliness and environmental limitations) | CAO.A.060(b)/(e)/(f) | 2.7 | Cleanliness standards of maintenance facilities |
| C.5 | Maintenance accomplishment and maintenance standards | CAO.A.095(a)(1); CAO.A.060(c); Appendix I points (b)/(c)/(d) | 2.6 | Use of tooling and equipment by staff (including alternate tools) |
| 2.9 | Repair procedure |
| 2.10 | Aircraft maintenance programme compliance |
| 2.11 | Airworthiness directives procedure |
| 2.12 | Optional modification procedure |
| 2.16 | Release to service procedure |
| C.6 | Prevention of maintenance error | CAO.A.060(g)/(i) | 2.25 | Procedures to detect and rectify maintenance errors. |
| C.7 | Critical maintenance tasks and error-capturing method | CAO.A.060(h) | 2.23 | Critical maintenance tasks and error-capturing methods |
| L2.7 | Line procedure for critical maintenance tasks and error-capturing methods |
| C.8 | Fabrication | CAO.A.020(c) |  |  |
| C.9 | Certifying staff responsibilities and maintenance release | CAO.A.040(a); CAO.A.065; CAO.A.070; CAO.A.095(a)(4) | 2.11 | Airworthiness directives procedure |
| 2.16 | Release to service procedure |
| L2.4 | Line procedure for completion of technical log |
| 4.2 | Operator procedures and paperwork |
| 6 | OPERATORS MAINTENANCE PROCEDURES |
| C.10 | Defects arising during maintenance | CAO.A.075(b)(6) | 2.15 | Rectification of defects arising during base maintenance |
| 2.18 | Reporting of defects to the competent authority / operator / manufacturer |
| L2.3 | Line maintenance control of defects and repetitive defects |
| C.11 | Maintenance away from approved location  | CAO.A.095(a)(3) |  |  |
| C.12 | Procedure for component maintenance under aircraft or engine rating | Appendix I point (b)/(c) |  |  |
| C.13 | Procedure for maintenance on installed engine (or component) under engine (or component) rating | Appendix I point (c)/(d) |  |  |
| C.14 | Special procedures (specialised tasks, NDT, engine running…) | CAO.A.030(a); Appendix I point (e) | 2.9 | Repair procedure |
| 2.24 | Reference to specific maintenance procedures such as -— Engine running procedures— Aircraft pressure run procedures— Aircraft towing procedures— Aircraft taxiing procedures |
| L2.2 | Line maintenance procedures related to servicing/fuelling/de-icing, including inspection for/removal of de-icing/anti-icing fluid residues, etc. |
| C.15 | Issue of ARC under maintenance privilege | CAO.A.095(c)(2) | 2.29 | Airworthiness review procedures and records for ELA1 aircraft not involved in commercial operations |
| **PART E – SUPPORTING DOCUMENTS** |  |  |
| E.1 | Sample documents |  | 5.1 | Sample of documents |
| 2.13 | Maintenance documentation in use and its completion |
| E.2 | List of subcontracted organisations |   | 5.2 | List of Subcontractors as per 145.A.75(b) |
| E.3 | List of organisation contracted by the CAO |  | 5.4 | List of contracted organisations as per 145.A.70(a)(16) |
| E.4 | Aircraft technical log system (if applicable) |  |  |  |
| E.5 | List of the currently approved alternative means of compliance |  |  |  |
| E.6 | Copy of contracts for subcontracted continuing airworthiness tasks |  |  |  |

\*: these elements are not explicitly required by Part-CAO, but if associated procedures already exist in the organisation that transitions to Part-CAO, it is recommended to integrate them in the CAE under the chapter indicated.

## Appendix VII — Comparison CAE with Part-MF MOM (small organisation)

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Chapter | Description | Implementing rule reference | MOM small org. chapter | MOM (small org.) chapter description(Appendix IV to AMC M.A.604) |
| **PART A – GENERAL DESCRIPTION** |  |  |
| A.1 | Statement by accountable manager | CAO.A.025(a)(1); CAO.A.035(a) | Part A | Accountable manager statement |
| A.2 | General presentation of the organisation | CAO.A.035(a); CAO.A.100(e) | Part B | Description— General presentation of the organisation |
| A.3 | Description and location of the facilities | CAO.A.025(a)(9); CAO.A.030 | Part B | Description— Organisation’s scope of work— Identification of the level of work which can be performed at each facility.— General description of the facility |
| Part E | Appendices— List of maintenance locations. |
| A.4 | Scope of work | CAO.A.020(a); CAO.A.025(a)(2); CAO.A.095(e); Appendix I point (a) | Part B | Description— Organisation’s scope of work |
| A.5 | Exposition amendments and changes to the organisation | CAO.A.025(a)(11)/(c); CAO.A.105 | Part A | Amendment procedure |
| Part D | Working Procedures— Management of indirect approval of the manual |
| A.6 | Procedure for alternative means of compliance | CAO.A.017 |  |  |
| A.7 | Management personnel | CAO.A.025(a)(3); CAO.A.035(b); CAO.A.100(a) | Part B | Description— Name and title of management personnel |
| A.8 | Organisation chart | CAO.A.025(a)(4) | Part B | Description— Organisation chart |
| A.9 | Manpower resources | CAO.A.035(d) | Part B | Description— Personnel— Technical personnel (number, qualifications and experience)— Administrative personnel (number) |
| A.10 | List of certifying staff | CAO.A.025(a)(5) | Part B | Description— Certifying staff and airworthiness review staff |
| A.11 | List of staff responsible for the development and approval of AMP | CAO.A.025(a)(6) |  |  |
| A.12 | List of airworthiness review staff | CAO.A.025(a)(7); CAO.A.045(d) | Part B | Description— Certifying staff and airworthiness review staff |
| A.13 | List of staff responsible for the issuance of permits to fly | CAO.A.025(a)(8) |  |  |
| **PART B – GENERAL PROCEDURES** |  |  |
| B.1 | Quality (or organisational review) system | CAO.A.100(a)/(b)/(d)/(e)/(f) | Part C | General Procedures— Organisational review |
| B.2 | Audit plan (or frequency and content of organisational review) | CAO.A.100(b)/(f) | Part C | General Procedures— Organisational review— Organisation, frequency, scope and content (including processing of authority’s findings)— Planning and performance of the review |
| B.3 | Monitoring of maintenance contracts | CAO.A.100(b)(2) |  |  |
| B.4 | Qualification, assessment and training of staff | CAO.A.035(c)/(d)/(e)/(f); CAO.A.040(a); CAO.A.045(a)/(b)/(c); CAO.A.060(a) | Part B | Description— Personnel— Technical personnel (number, qualifications and experience) |
| Part C | General Procedures— Training |
| B.5 | One-off certification authorisation | CAO.A.040(b) | Part C | General Procedures— One time authorisations |
| B.6 | Limited certification authorisation | CAO.A.040(c) |  |  |
| B.7 | Subcontracting | CAO.A.095(a)(2)/(b)(3); CAO.A.100(f) | Part C | General Procedures— Training |
| B.8 | Maintenance data and continuing airworthiness management data | CAO.A.055(a); CAO.A.080 | Part C | General Procedures— Subcontracting of specialised services |
| B.9 | Records management and retention | CAO.A.035(e); CAO.A.040(d); CAO.A.045(e); CAO.A.050(b); CAO.A.060(j); CAO.A.075(a)/(b)(9); CAO.A.090; CAO.A.100(c); CAO.A.085 | Part D | Working Procedures— Records |
| B.10 | Carrying out the airworthiness review | CAO.A.085; CAO.A.095(c) | Part D | Working Procedures— Airworthiness review procedures and records for ELA1 aircraft not involved in commercial operations |
| B.11 | Conformity with approved flight conditions | CAO.A.095(d) |  |  |
| B.12 | Issue of the permit to fly | CAO.A.095(d); CAO.A.045(a) |  |  |
| **PART C – MAINTENANCE PROCEDURES** |  |  |
| C.1 | Maintenance - general | CAO.A.025(10) | Part D | Working Procedures— Occurrence reporting |
| C.2 | Work order acceptance | CAO.A.055(b) | Part D | Working Procedures— Work order acceptance— Preparation and issue of the work package— Control of the work order |
| C.3 | Components, equipment, tools and material (supply, acceptance, segregation, storage, calibration…) | CAO.A.050; CAO.A.060(d); CAO.A.030(b) | Part B | Description— Tools, equipment and material |
| Part D | Working Procedures— Logistics— Execution— Procedures for accepting components from stores including eligibility check— Procedures for returning unserviceable components to stores |
| C.4 | Maintenance facility (selection, organisation, cleanliness and environmental limitations) | CAO.A.060(b)/(e)/(f) |  |  |
| C.5 | Maintenance accomplishment and maintenance standards | CAO.A.095(a)(1); CAO.A.060(c); Appendix I points (b)/(c)/(d) | Part D | Working Procedures— Preparation and issue of the work package— Preparation of the planned work— Work package content (copy of forms, work cards, procedure for their use, distribution)— Responsibilities and signatures needed for the authorisation of the work— Execution |
| C.6 | Prevention of maintenance error | CAO.A.060(g)/(i) |  |  |
| C.7 | Critical maintenance tasks and error-capturing method | CAO.A.060(h) |  |  |
| C.8 | Fabrication | CAO.A.020(c) |  |  |
| C.9 | Certifying staff responsibilities and maintenance release | CAO.A.040(a); CAO.A.065; CAO.A.070; CAO.A.095(a)(4) | Part D | Working Procedures— Release to Service – Certifying staff— Release to Service – Supervision— Release to Service – Certificate of release to service |
| C.10 | Defects arising during maintenance | CAO.A.075(b)(6) |  |  |
| C.11 | Maintenance away from approved location  | CAO.A.095(a)(3) |  |  |
| C.12 | Procedure for component maintenance under aircraft or engine rating | Appendix I point (b)/(c) |  |  |
| C.13 | Procedure for maintenance on installed engine (or component) under engine (or component) rating | Appendix I point (c)/(d) |  |  |
| C.14 | Special procedures (specialised tasks, NDT, engine running…) | CAO.A.030(a); Appendix I point (e) | Part D | Working Procedures— Special procedures  |
| C.15 | Issue of ARC under maintenance privilege | CAO.A.095(c)(2) |  |  |
| **PART E – SUPPORTING DOCUMENTS** |  |  |
| E.1 | Sample documents |  | Part E | Appendices— Sample of all documents used |
| E.2 | List of subcontracted organisations |   | Part E | Appendices— List of subcontracted specialised services |
| E.3 | List of organisation contracted by the CAO |  | Part E | Appendices— List of Part-145 or M.A. Subpart F organisations |
| E.4 | Aircraft technical log system (if applicable) |  |  |  |
| E.5 | List of the currently approved alternative means of compliance |  |  |  |
| E.6 | Copy of contracts for subcontracted continuing airworthiness tasks |  |  |  |

## Appendix VIII — Comparison CAE with Part-MG CAME

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Chapter | Description | Implementing rule reference CAO | CAME chapter | CAME description (Appendix V to AMC M.A.704) |
| **PART A – GENERAL DESCRIPTION** |  |  |
| A.1 | Statement by accountable manager | CAO.A.025(a)(1); CAO.A.035(a) | 0.1  | Corporate commitment by the accountable manager  |
| A.2 | General presentation of the organisation | CAO.A.035(a); CAO.A.100(e) | 0.2  | General information  |
| A.3 | Description and location of the facilities | CAO.A.025(a)(9); CAO.A.030 | 0.2  | General information  |
| A.4 | Scope of work | CAO.A.020(a); CAO.A.025(a)(2); CAO.A.095(e); Appendix I point (a) | 0.2(c) | General information - Scope of work — Aircraft managed  |
| A.5 | Exposition amendments and changes to the organisation | CAO.A.020(a)(1)&(2); CAO.A.025(a)(11)/(c); CAO.A.105 | 0.5  | Procedure to notify the competent authority of changes to the organisation’s activities/approval/location/personnel  |
| 0.6 | Exposition amendment procedures  |
| A.6 | Procedure for alternative means of compliance | CAO.A.017 |  |  |
| A.7 | Management personnel | CAO.A.025(a)(3); CAO.A.035(b); CAO.A.100(a) | 0.3  | Management personnel  |
| A.8 | Organisation chart | CAO.A.025(a)(4) | 0.4  | Management organisation chart  |
| A.9 | Manpower resources | CAO.A.035(d) | 0.3(e)(1) | Management personnel - Manpower resources |
| A.11 | List of staff responsible for the development and approval of AMP | CAO.A.025(a)(6) |  |  |
| A.12 | List of airworthiness review staff | CAO.A.025(a)(7); CAO.A.045(d) | 5.2  | List of airworthiness review staff  |
| A.13 | List of staff responsible for the issuance of permits to fly | CAO.A.025(a)(8) | 4B.3  | Permit to fly authorised signatories  |
| **PART B – GENERAL PROCEDURES** |  |  |
| B.1 | Quality (or organisational review) system | CAO.A.100(a)/(b)/(d)/(e)/(f) | 2.1  | Continuing airworthiness quality policy, plan and audit 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  |
| B.2 | Audit plan (or frequency and content of organisational review) | CAO.A.100(b)/(f) | 2.1  | Continuing airworthiness quality policy, plan and audit procedure  |
| B.3 | Monitoring of maintenance contracts | CAO.A.100(b)(2) | 2.5  | Monitoring that all contracted maintenance is carried out in accordance with the contract, including subcontractors used by the maintenance contractor  |
| B.4 | Qualification, assessment and training of staff | CAO.A.035(c)/(d)/(e)/(f); CAO.A.040(a); CAO.A.045(a)/(b)/(c); CAO.A.060(a) | 2.6  | Quality audit personnel  |
| 4.1  | Airworthiness review staff  |
| 4B.3  | Permit to fly authorised signatories  |
| B.7 | Subcontracting | CAO.A.095(a)(2)/(b)(3); CAO.A.100(f) | 2.2  | Monitoring of continuing airworthiness management activities  |
| B.8 | Maintenance data and continuing airworthiness management data | CAO.A.055(a); CAO.A.080 |  |  |
| B.9 | Records management and retention | CAO.A.035(e); CAO.A.040(d); CAO.A.045(e); CAO.A.050(b); CAO.A.060(j); CAO.A.075(a)/(b)(9); CAO.A.090; CAO.A.100(c); CAO.A.085 | 1.3  | Time and continuing airworthiness records, responsibilities, retention and access  |
| 4.2  | Review of aircraft records  |
| 4.7  | Airworthiness review records, responsibilities, retention and access  |
| 4B.5  | Permit to fly records, responsibilities, retention and access  |
| 1.1 | Aircraft continuing airworthiness record system utilisation |
| B.10 | Carrying out the airworthiness review | CAO.A.085; CAO.A.095(c) | 4.3  | Physical survey  |
| B.11 | Conformity with approved flight conditions | CAO.A.095(d) | 4B.1  | Conformity with approved flight conditions  |
| B.12 | Issue of the permit to fly | CAO.A.095(d); CAO.A.045(a) | 4B.2  | Issue of the permit to fly under the CAMO privilege  |
| 4B.4  | Interface with the local authority for the flight  |
| **PART D – CONTINUING AIRWORTHINESS MANAGEMENT PROCEDURES** |  |  |
| D.1 | Continuing airworthiness management - general | CAO.A.025(10); CAO.A.095(b)(1); CAO.A.075(a)/(b)(7)/(b)(9) | 1.9  | Engineering activity  |
| D.2 | MEL (and CDL) application  | CAO.A.075(a) | 1.1  | Aircraft technical log utilisation and MEL application  |
| D.3 | AMP development, control and periodic review  | CAO.A.075(a)/(b)(1)/(b)(2); CAO.A.095(b)(2) | 1.2  | Aircraft maintenance programmes — development amendment and approval  |
| 1.5  | Analysis of the effectiveness of the maintenance programme(s)  |
| 1.10  | Reliability programmes  |
| D.4 | Airworthiness directives and other mandatory airworthiness requirements | CAO.A.075(a)/(b)(5)/(b)(8) | 1.4  | Accomplishment and control of airworthiness directives  |
| D.5 | Modifications and repairs | CAO.A.075(b)(3) | 1.6 \* | Non-mandatory modification embodiment policy  |
|  |  |  | 1.7  | Major repair and modification standards  |
| D.6 | Pre-flight inspection | CAO.A.075(a) | 1.11  | Pre-flight inspections  |
| D.7 | Defects | CAO.A.075(b)(6) | 1.8  | Defect reports  |
| D.8 | Establishment of contracts and work orders for the maintenance | CAO.A.075(a)/(b)(4)/(b)(7) | 3.1 | Maintenance contractor selection procedure |
| D.9 | Coordination of maintenance activities | CAO.A.075(b)(8) | 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  |
| D.10 | Mass and balance statement | CAO.A.075(a)/(b)(10) | 1.12  | Aircraft weighing  |
| D.11 | Issue of ARC or ARC recommendation | CAO.A.095(c)(1)(i) | 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 of ARC  |
| D.12 | ARC extension | CAO.A.095(b)(4)/(c)(1)(ii) | 4.6  | Issue of ARC  |
| D.13 | Maintenance check flights | CAO.A.075(a) | 1.13  | Check flight procedures  |
| **PART E – SUPPORTING DOCUMENTS** |  |  |
| E.1 | Sample documents |  | 5.1  | Sample documents  |
| E.2 | List of subcontracted organisations |   | 5.3  | List of subcontractors as per M.A.711(a)(3)  |
|  |  |
| E.3 | List of organisation contracted by the CAO |  | 5.4  | List of contracted approved maintenance organisations  |
| E.4 | Aircraft technical log system (if applicable) |  | 1.1  | Aircraft technical log utilisation and MEL application  |
| E.5 | List of the currently approved alternative means of compliance |  |  |  |
| E.6 | Copy of contracts for subcontracted continuing airworthiness tasks |  | 5.5 | Copy of contracts for subcontracted work (Appendix II to AMC M.A.711(a)(3)) |

\*: these elements are not explicitly required by Part-CAO, but if associated procedures/document already exist in the organisation that transitions to Part-CAO, it is recommended to integrate them in the CAE under the chapter indicated.

## Appendix IX — Amending CAME from Part-MG to Part-CAMO

The text of this appendix is arranged to show deleted text, new or amended text as shown below, to revise an existing Part-MG exposition with the objective to show compliance with Part-CAMO.

* deleted text is ~~struck through~~;
* new or amended text is highlighted in blue.

|  |  |
| --- | --- |
| Part 0 | General organisation, safety policy and objectives |
| 0.1 |  | Safety policy, objectives and ~~Corporate commitment by the~~ accountable manager statement |
| 0.2 |  | General information and scope of work |
| 0.3 |  | Management personnel |
| 0.4 |  | Management organisation chart |
| 0.5 |  | Procedure for changes requiring prior approval ~~to notify the competent authority of changes to the organisation’s activities/approval/location/personnel~~ |
| 0.6 |  | Procedure for changes not requiring prior approval ~~Exposition amendment procedures~~ |
| 0.7 |  | Procedure for alternative means of compliance (AltMoC) |
| Part 1 | Continuing airworthiness management procedures |
| 1.1a |  | Use of aircraft continuing airworthiness record system and if applicable, aircraft technical log (ATL) system ~~utilisation and MEL application~~ ~~Aircraft continuing airworthiness record system utilisation~~  |
| 1.1b |  | MEL application |
| 1.2 |  | Aircraft maintenance programme~~s~~ (AMP) — development amendment and approval |
| 1.3 |  | ~~Time and~~ Continuing airworthiness records, responsibilities, retention and 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 and inspections ~~embodiment policy~~ |
| 1.7 |  | ~~Major~~ Repairs and modifications ~~standards~~ |
| 1.8 |  | Defect reports |
| 1.9 |  | Engineering activity |
| 1.10 |  | Reliability programmes |
| 1.11 |  | Pre-flight inspections |
| 1.12 |  | Aircraft weighing |
| 1.13 |  | Maintenance check flight procedures |
| Part 2 | ~~Quality system~~ **Management system procedures** |
| 2.1 |  | Hazard identification and safety risk management schemes |
| 2.2 |  | Internal safety reporting and investigations |
| 2.3 |  | Safety action planning |
| 2.4 |  | Safety performance monitoring |
| 2.5 |  | Change management  |
| 2.6 |  | Safety training and promotion |
| 2.7 |  | Immediate safety action and coordination with operator’s emergency response plan (ERP) |
| 2.8 |  | Compliance monitoring  |
| 2.8.1 |  | ~~Continuing airworthiness quality policy,~~ Audit plan and audit procedure |
| 2. 8.2 |  | Monitoring of continuing airworthiness management activities |
| 2. 8.3 |  | Monitoring of the effectiveness of the maintenance programme(s) |
| 2. 8.4 |  | Monitoring that all maintenance is carried out by an appropriate maintenance organisation |
| 2. 8.5 |  | Monitoring that all contracted maintenance is carried out in accordance with the contract, including subcontractors used by the maintenance contractor |
| 2. 8.6 |  | Compliance monitoring ~~Quality audit~~ personnel |
| 2.9 |  | Control of personnel competency |
| 2.10 |  | Management system record-keeping |
| 2.11 |  | Occurrence reporting |
| Part 3 | Contracted maintenance — management of maintenance |
| 3.1 |  | Maintenance contractor selection procedure |
| 3.2 |  | ~~Quality~~ Product audit of aircraft |
| Part 4 | Airworthiness review procedures |
| 4.1 |  | Airworthiness review staff |
| 4.2 |  | Documented 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 of ARC |
| 4.7 |  | Airworthiness review records, responsibilities, retention and access |
| 4.8 |  | ARC extension |
| 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, including the template of the ATL system |
| 5.2  |  | List of airworthiness review staff |
| 5.3  |  | List of subcontractors as per ~~M.A.711(a)(3)~~ CAMO.A.125(d)(3) |
| 5.4  |  | List of contracted ~~approved~~ maintenance organisations and list of maintenance contracts as per CAMO.A.300(a)(13) |
| 5.5  |  | Copy of contracts for subcontracted work (Appendix II to AMC1 CAMO.A.125(d)(3) ~~AMC M.A.711(a)(3)~~) |
| 5.6 |  | List of approved maintenance programme as per CAMO.A.300(a)(12) |
| 5.7 |  | List of currently approved alternative means of compliance as per CAMO.A.300(a)(13) |

1. Except for aeroplanes with a MTOM at or below 5 700 kg which are equipped with multiple turboprop engines (Art. 3(7)). [↑](#footnote-ref-1)
2. Aircraft operation for which an operating licence delivered i.a.w. Regulation (EC) No 1008/2008 is required. [↑](#footnote-ref-2)