

# Welcome to the CAA Airworthiness Webinar

## Safety Management in Pt CAMO

24<sup>th</sup> September 2020, 13:00 Start

| Time          | Title   | Speaker                         |
|---------------|---|---------------------------------|
| 13:05 – 13:30 | Transition from Part M Subpart G to Part CAMO   | Tim Weeks (CAA)                 |
| 13:30 - 13:45 | Part CAMO Management system requirements        | Jason Digance (CAA)             |
| 13:45 – 14:05 | CAA SMS Evaluation tool and available resources | Matt Lillywhite (CAA)           |
| 14:05 – 14:30 | Industry Presentation                           | Dr Camille Burban (TUI Airways) |
| 14.30 – 14.40 | Comfort Break                                   |                                 |
| 14:40 – 15:05 | Industry Presentation                           | Sandra Weeks (Alto Aerospace)   |
| 15:05 – 15:30 | CAA's Oversight experience and expectations     | Dr Marie Langer (CAA)           |
| 15:30 – 16:00 | Questions, feedback and close                   | (All speakers)                  |

# Housekeeping

No videos

Please keep all microphones on Mute

Comfort break between 14.30 – 14.40

Questions      Go to **slido.com** and enter event code **CAMO**

Questions will be moderated and presented at the end of each presentation or at the end of the webinar

# CAA Airworthiness Safety Team



Dr Marie Langer



Jason Digance



Dave Crompton



Pete Prendergast



Matt Lillywhite



Steve Knight



Alison Milborrow

# Tim Weeks

Airworthiness Surveyor  
Fixed Wing CAMO



# Part CAMO

- Application Standards
- Integrated Management System
- AltMOC & Changes not requiring prior approval



# Part CAMO

## Application Standards



# Application

# Scheme of Charges

- Official Record Series 5 (ORS 5) No 360 dated 20 March 2020 (Commencement date 06 April 2020)

Table 12:

|   |      |
|---|------|
| Part-M Subpart G or Part-145 transitioning to Part-CAMO | £850 |
|---|------|



# CAMO.A.115 Application for an organisation certificate

(a) The application for a certificate or an amendment to an existing certificate in accordance with this Annex shall be made in a form and manner established by the competent authority, taking into account the applicable requirements of Annex I (Part-M), Annex Vb (Part-ML) and this Annex.

<https://www.caa.co.uk/Commercial-industry/Aircraft/Airworthiness/Organisation-and-maintenance-programme-approvals/EASA-Part-CAMO/Apply-for-a-Part-CAMO-approval-AOC/>



# CAMO.A.115 Application for an organisation certificate

(b) Applicants for an initial certificate pursuant to this Annex shall provide the competent authority with:

- (1) the results of a pre-audit performed by the organisation against the applicable requirements provided for in Annex I (Part-M), Annex Vb (Part-ML) and this Annex;
- (2) documentation demonstrating how they will comply with the requirements established in this Regulation.

Such documentation shall include, as provided for in point CAMO.A.130, a procedure describing how changes not requiring prior approval will be managed and notified to the competent authority.

<https://www.caa.co.uk/Commercial-industry/Aircraft/Airworthiness/Organisation-and-maintenance-programme-approvals/EASA-Part-CAMO/Apply-for-a-Part-CAMO-approval-AOC/>



# CAMO.A.115 Application for an organisation certificate

1. Apply through Website
2. Attach requested documentation:
  - i. CAME
    - a. Conforms to AMC1 CAMO.A.300
    - b. Cross reference table
    - c. Safety Management Manual (SRG1770 Compliance Statement)
    - d. Compliance Monitoring Manual (SRG1771 Compliance Statement)
    - e. First Issue (Not current CAME version)
  - ii. Results of a pre-audit performed by the organisation against applicable requirement
    - a. Part M
    - b. Part ML
    - c. Part CAMO
  - iii. Nominated Post Holders (SRG1769)
  - iv. Copy of contracts for continuing airworthiness tasks subcontracted to other organisations
  - v. Completed evaluation using the SMS evaluation tool ([link](#))



# CAMO.A.115 Application for an organisation certificate

## 2. Attach requested documentation (Continued):

- vi. CAME Compliance Checklist
- vii. Regulation Compliance Checklist



# CAMO.A.115 Application for an organisation certificate

## FINDING



The organisation was unable to demonstrate that they were fully compliant with CAMO.A.115 (b) 1 with regard to application requirements for initial certificate.

Evidenced by:

The organisation has not submitted:

1. XXXXXXXXXXXX
2. XXXXXXXXXXXX
3. XXXXXXXXXXXX

# 2 Audits

## SMS Audit

- Actioned by SMS team

## CAMO Audit

- Actioned by Allocated Surveyor

Note: Until Part CAMO certificate is issued, oversight of the organisation will remain under Part MG. There will be no 'transition findings' with a due date of 24<sup>th</sup> September 2021.

## Final Stages:

[illegible]



# Timeframes

- Part MG certificates expire on 24<sup>th</sup> September 2021

- No new Part MG certificates after 24<sup>th</sup> September 2020

- All applications received by March 2021
  - All audits completed by July 2021
- All findings closed by end of August 2021
- Review board completed by 1<sup>st</sup> September



- Timeframe extensions ????

# Applications to date

12 / 180 approx.

168 organisations remaining. That's 336 audits to be completed within the next year! Do not leave the application too late!

# Application Summary

- Ensure compliance can be demonstrated
- The CAA is not using the EASA transition plan
- Do not leave applications to the last minute

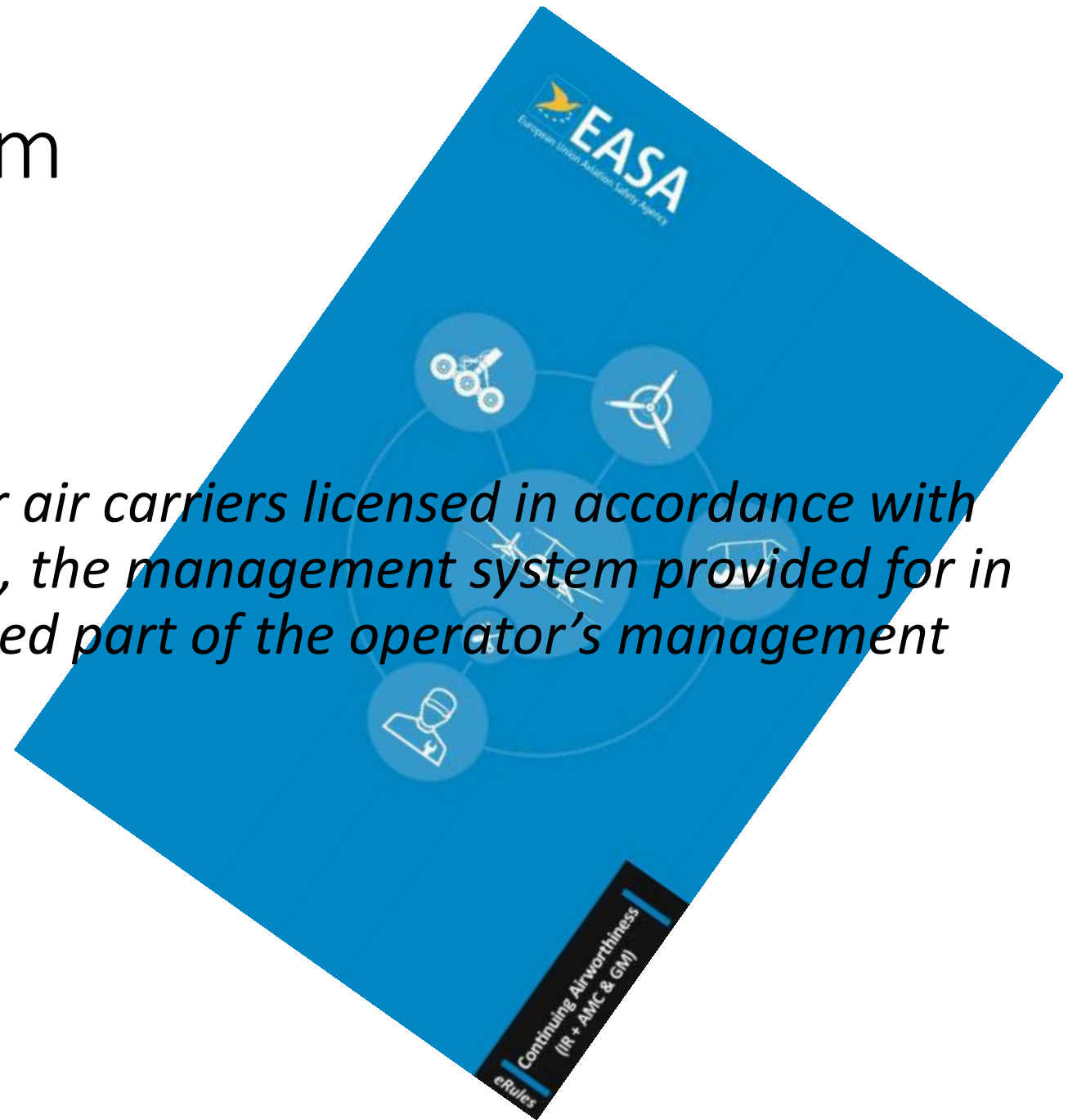
# Part CAMO

## Integrated Management System

# Management System

- CAMO.A.200 (d)

*“Notwithstanding point (c), for air carriers licensed in accordance with Regulation (EC) No 1008/2008, the management system provided for in this Annex shall be an integrated part of the operator’s management system.”*





# Integrated System

## ORO.GEN.200 Management system

*Regulation (EU) No 965/2012*

- (a) The operator shall establish, implement and maintain a management system that includes:
  - (1) clearly defined lines of responsibility and accountability throughout the operator, including a direct safety accountability of the accountable manager;
  - (2) a description of the overall philosophies and principles of the operator with regard to safety, referred to as the safety policy;
  - (3) the identification of aviation safety hazards entailed by the activities of the operator, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness;
  - (4) maintaining personnel trained and competent to perform their tasks;
  - (5) documentation of all management system key processes, including a process for making personnel aware of their responsibilities and the procedure for amending this documentation;
  - (6) a function to monitor compliance of the operator with the relevant requirements. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary; and
  - (7) any additional requirements that are prescribed in the relevant Subparts of this Annex or other applicable Annexes.
- (b) The management system shall correspond to the size of the operator and the nature and complexity of its activities, taking into account the hazards and associated risks inherent in these activities.



## CAMO.A.200 Management system

*Regulation (EU) 2019/1383*

- (a) The organisation shall establish, implement, and maintain a management system that includes:
  - (1) clearly defined lines of responsibility and accountability throughout the organisation, including a direct safety accountability of the accountable manager;
  - (2) a description of the overall philosophies and principles of the organisation with regard to safety, referred to as the safety policy;
  - (3) the identification of aviation safety hazards entailed by the activities of the organisation, their evaluation and the management of associated risks, including taking actions to mitigate the risks and verify their effectiveness;
  - (4) maintaining personnel trained and competent to perform their tasks;
  - (5) documentation of all management system key processes, including a process for making personnel aware of their responsibilities and the procedure for amending this documentation;
  - (6) a function to monitor compliance of the organisation with the relevant requirements. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary;
  - (7) any additional requirements that are laid down in this Regulation.
- (b) The management system shall correspond to the size of the organisation and the nature and complexity of its activities, taking into account the hazards and associated risks inherent in these activities.
- (c) Where the organisation holds one or more additional organisation certificates within the scope of Regulation (EU) 2018/1139 and its delegated and implementing acts, the management system may be integrated with that required under the additional certificate(s) held.
- (d) Notwithstanding point (c), for air carriers licensed in accordance with Regulation (EC) No 1008/2008, the management system provided for in this Annex shall be an integrated part of the operator's management system.

# Safety Manager

- AMC1 ORO.GEN.200(a)(1) Management System

*“The management system of an operator should encompass safety by including a safety manager...”*

- AMC1 CAMO.A.200(a)(1) Management System

*“The management system should encompass safety by including a safety manager”*

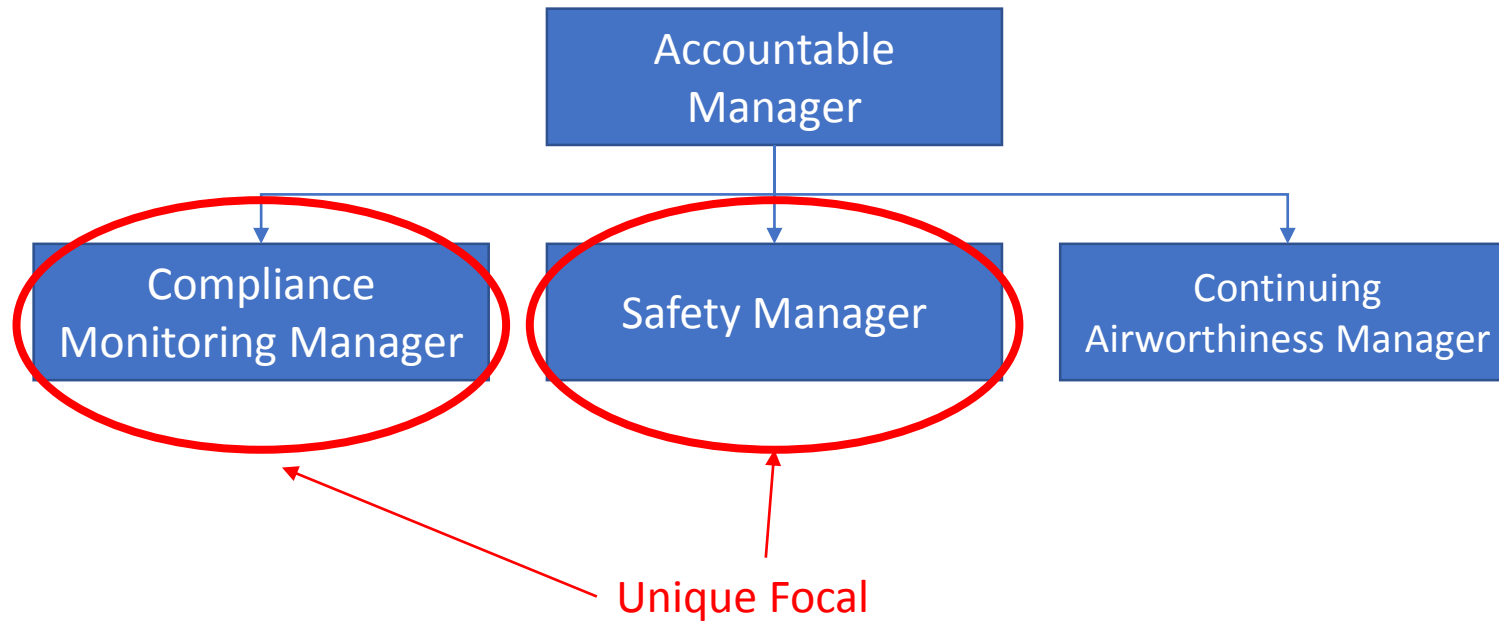
# Compliance Monitoring Manager

- AMC1 ORO.GEN.200(a)(6) Management System

“To ensure that the operator continues to meet the requirements of this Part and other applicable Parts, the accountable manager should designate a compliance monitoring manager...”

- No similar statement within CAMO.A.200 although Compliance Monitoring Manager is referenced many times. However, as an integrated system, a requirement on one regulation covers both.

# Organisation Structure (Integrated System)



# Unique Focal

- AMC1 CAMO.A.305(a)(4);(a)(5)
- (a) If more than one person is designated for the development, administration and maintenance of effective safety management processes, the accountable manager should identify the person who acts as the unique focal point, i.e. the 'safety manager'.
- (b) If more than one person is designated for the compliance monitoring function, the accountable manager should identify the person who acts as the unique focal point, i.e. the 'compliance monitoring manager'.

# CAMO.A.305 Personnel Requirements

## AMC1 CAMO.A.305(c) Personnel requirements

*ED Decision 2020/002/R*

### **KNOWLEDGE, BACKGROUND AND EXPERIENCE OF NOMINATED PERSON(S)**

Persons or group of persons nominated in accordance with points [CAMO.A.305\(a\)](#) and [CAMO.A.305\(b\)](#) should have:

- (e) a relevant engineering degree or an aircraft maintenance technician qualification with additional education that is acceptable to the competent authority. 'Relevant engineering degree' means an engineering degree from aeronautical, mechanical, electrical, electronic, avionic or other studies that are relevant to the maintenance and/or continuing airworthiness of aircraft/aircraft components;

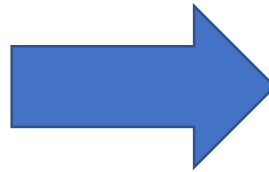
The above recommendation may be replaced by 5 years of experience in addition to those already recommended by paragraph (d) above. These 5 years should cover an appropriate combination of experience in tasks related to aircraft maintenance and/or continuing airworthiness management and/or surveillance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

# Alternative Means of Compliance

## Requirements for Safety Managers Alternative Means of Compliance

The CAA has published [Alternative AMC](#) allowing Airline Safety Managers previously approved under the air operation rules (Regulation (EU) No 965/2012, as amended) to meet the qualification requirements of Part CAMO.

SW2020/196



([Link to AltMoc](#))

Requirements for Safety Managers Alternative Means of Compliance to the first paragraph of paragraph (e) of AMC1 CAMO.A.305(c).

Implementing Regulation (EU) 2019/1383 (Part CAMO), amends and corrects Regulation (EU) 1321/2014 introducing Safety Management System (SMS). The associated AMC1 CAMO.A.305(c) specifies requirements for Safety Managers in relation to knowledge, qualification and experience.

The UK Civil Aviation Authority (the UK CAA) recognises that a considerable number of airline Safety Managers previously approved under the air operation rules (Regulation (EU) No 965/2012, as amended) are unlikely to meet the qualification requirements of Part CAMO.

Many existing Safety Managers may not fulfill the requirements in terms of satisfactory experience related to aircraft continuing airworthiness management.

Following is an alternative to the first paragraph of paragraph (e) of AMC1 CAMO.A.305(c), Personnel Requirements.

As an existing Safety Manager already approved by the CAA under the Regulation (EU) No 965/2012 for air operations and assisted by additional safety personnel in accordance with GM1 CAMO.A.305(a)(5), in order to meet the requirement of Part CAMO, the person should demonstrate they have successfully completed the following:

1. A recognised course covering all aspects of Annex I of Regulation (EU) No 1321/2014, as amended (Part M);
2. Training within a CAMO department for a minimum of two weeks gaining comprehensive knowledge of the following:
  - Development of Aircraft Maintenance Programme (AMP),
  - Aircraft Reliability Programmes,
  - Maintenance Steering Group methodology,
  - Maintenance Review Board process,
  - Continuing airworthiness tasks and general principles,
  - Continued airworthiness concepts and principles,
  - Maintenance standards;
3. Thorough knowledge of:
  - Organisation's CAME,
  - Maintenance methods,
  - Applicable regulations;
4. A relevant aviation qualification that demonstrates the applicant's adequate understanding/knowledge of engineering principles, e.g. ATPL.

The relationship between the Safety Manager and the additional safety personnel shall be clearly defined in the exposition with a clear outline of the delegated responsibilities. The Safety Manager remains the unique focal point.

Any change to the personnel structure applied under this alternative means of compliance shall be notified to the authority in line with CAMO.A.130(a)(5).



# Alternative Means of Compliance

## AMC1 CAMO.A.300 Continuing Airworthiness Management Exposition (CAME)

- Part 5.7 List of currently approved alternative means of compliance as per point CAMO.A.300(a)(13)

# Part CAMO

Changes Not requiring prior Approval  
Alternative Means of Compliance

- Alternative Means of Compliance
- Changes Not Requiring Prior Approval



# Alternative Means of Compliance

# Alternative Means of Compliance

There are 3 levels of Regulatory Material:

1. Basic Regulation
2. Implementing Rules to the Basic Regulation
3. Soft Law

The Basic Regulation empowers EASA to develop 3 different types of soft law: Certification Specifications (CS), **Acceptable Means of Compliance (AMC)** and Guidance Material.



# Alternative Means of Compliance

- Since AMC's are non-binding, regulated persons may choose alternative means to comply with the rule. In this case, however, they lose the **presumption of compliance** provided by the EASA AMC, and need to demonstrate to National Aviation Authorities that they comply with the law.
- The implementing rules for Part CAMO describe the process to be used by regulated persons and National Aviation Authorities when they intend to use AltMOCs to comply with the rules.

# Alternative Means of Compliance

## CAMO.A.120 Means of compliance

*Regulation (EU) 2019/1383*

- (a) Alternative means of compliance to the AMC adopted by the Agency may be used by an organisation to establish compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts.
- (b) When an organisation wishes to use an alternative means of compliance, it shall, prior to using it, provide the competent authority with a full description of the alternative means of compliance. The description shall include any revisions to manuals or procedures that may be relevant, as well as an assessment demonstrating compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts.

The organisation may use these alternative means of compliance subject to prior approval by the competent authority, and upon receipt of the notification as provided for in point [CAMO.B.120](#).



# Alternative Means of Compliance

- Speak to your surveyor
- Apply using form SRG1840
- Check 'scheme of charges' for relevant fee
- Receive response from the CAA
- Published in CAP1721
- List in Part 5.7 of the CAME

**Application for an Alternative Means of Compliance (AltMOC) in relation to Implementing Rules under Regulation (EC) No. 2018/1139.**

Please complete this form online (preferred method) then print, sign and submit as instructed. Alternatively, print, then complete in BLOCK CAPITALS using black or dark blue ink

Please read the attached Guidance Notes before completing this form.

This form is configured to work best with Internet Explorer and Adobe Acrobat, for best results download the form to your computer and open it in your pdf viewer.

**FALSE REPRESENTATION STATEMENT**

It is an offence under the UK Air Navigation Order to make, with intent to deceive, any false representation for the purposes of procuring the grant, issue, renewal or variation of any certificate, licence, approval, permission or other document. This offence is punishable on summary conviction by a fine, and on conviction on indictment with an unlimited fine or imprisonment or both.

**1. APPLICANT TYPE**

|   |                        |   |                        |
|---|------------------------|---|------------------------|
| Individual  | Complete Section 2.(a) | Limited Company                                       | Complete Section 2.(b) |
| Partnership   | Complete Section 2.(a) | Charity   | Complete Section 2.(c) |
| Private Clubs   | Complete Section 2.(a) | Ministry of Defence                                   | Complete Section 2.(c) |
| (unless a Limited Liability Partnership or Limited Company) |                        | Trust   | Complete Section 2.(c) |
| Limited Liability Partnership                               | Complete Section 2.(b) | Public Educational Establishment (University/College) | Complete Section 2.(c) |

**This application will be considered in respect of and, if appropriate, granted or issued to, the applicant(s) named below.**

**2. APPLICANT DETAILS (The Applicant is the person responsible for payment of CAA charges)**

**a) Individual (including sole traders and partnerships)**

Title: ..... Forename: ..... Surname: .....

Address: .....

Country: ..... Postcode: .....

Telephone: ..... Fax: .....

E-mail: ..... Mobile Telephone: .....

Trading Name: (if applicable) .....

Website address: .....

In the case of a partnership, please complete details of all partners. Continued on a separate sheet

**This application will be considered in respect of and, if appropriate, granted to, the Company Name as registered under the Company Number provided on this form.**

**b) A Company**

Registered Company Name (in full): .....

Registered Company Number: .....

Country of Company Registration: .....

Registered Office Address: .....

Postcode: .....

Telephone: ..... Fax: .....

E-mail: .....

Trading Name: (if applicable) .....

Trading Address (primary site): .....

Country: ..... Postcode: .....

Website address: .....

Form SRG1840 Issue 02, October 2018

Page 1 of 6

# Changes not requiring prior approval

Changes not requiring prior approval

Indirect Approval?



# Part M Vs Part CAMO

## M.A.302(c) Aircraft maintenance programme

“When the continuing airworthiness of aircraft is managed by a CAMO or CAO, or when there is a limited contract between the owner and a CAMO or CAO concluded in accordance with point M.A.201(i)(3), the AMP and its amendments may be approved through an indirect approval procedure...”

## CAMO.A.130(c) Changes to the organisation

“All changes not requiring prior approval shall be managed and notified to the competent authority as defined in the procedure referred to in point (b) of point CAMO.A.115 and approved by the competent authority in accordance with point (h) of point CAMO.B.310.”

# Changes requiring prior approval

Examples from CAMO.A.130(a) and GM1 CAMO.A.130(b) include:

- changes that affect the scope of the certificate or the terms of approval of the organisation
- changes to nominated personnel
- changes to the reporting lines between the nominated personnel and the accountable manager
- the procedure as regards changes not requiring prior approval referred to in point.
- changes to the alternative means of compliance
- changes to the CAME procedure for the completion of an airworthiness review under supervision of the organisation's authorised airworthiness review staff
- changes to the procedure to establish and control the competency of personnel
- changes to the procedure for the indirect approval of the maintenance programme of Part-M aircraft

# Changes not requiring prior approval

## GM1 CAMO.A.130 Changes to the organisation

*ED Decision 2020/002/R*

### CHANGES REQUIRING OR NOT REQUIRING PRIOR APPROVAL

The rule point [CAMO.A.130](#) is structured as follows:

- Point (a) introduces an obligation of prior approval (by the competent authority) for specific cases listed under (1) to (4).
- Point (b) address all instances (including (a)) where the Regulation explicitly requires an approval by the competent authority (e.g. CAME procedure for the completion of an airworthiness review under supervision, ref. [CAMO.A.310\(c\)](#)). Changes relevant to these instances should be considered as changes requiring a prior approval (see list in [GM1 CAMO.A.130\(b\)](#)), unless otherwise specified by the Regulation.
- Point (b) also indicates how all changes requiring prior approval are to be handled.
- Point (c) introduces the possibility to agree with the competent authority that certain changes to the organisation (other than those covered by (a) or (b)) can be implemented without prior approval depending on the compliance and safety performance of the organisation, and in particular, on its capability to apply change management principles.

# Changes not requiring prior approval



- As defined in Part 0.6 of the CAME
- It should not exceed the scope of organisations Part MG 'indirect approval'.

