

CIVIL AVIATION DIRECTORATE
AIRWORTHINESS INSPECTORATE

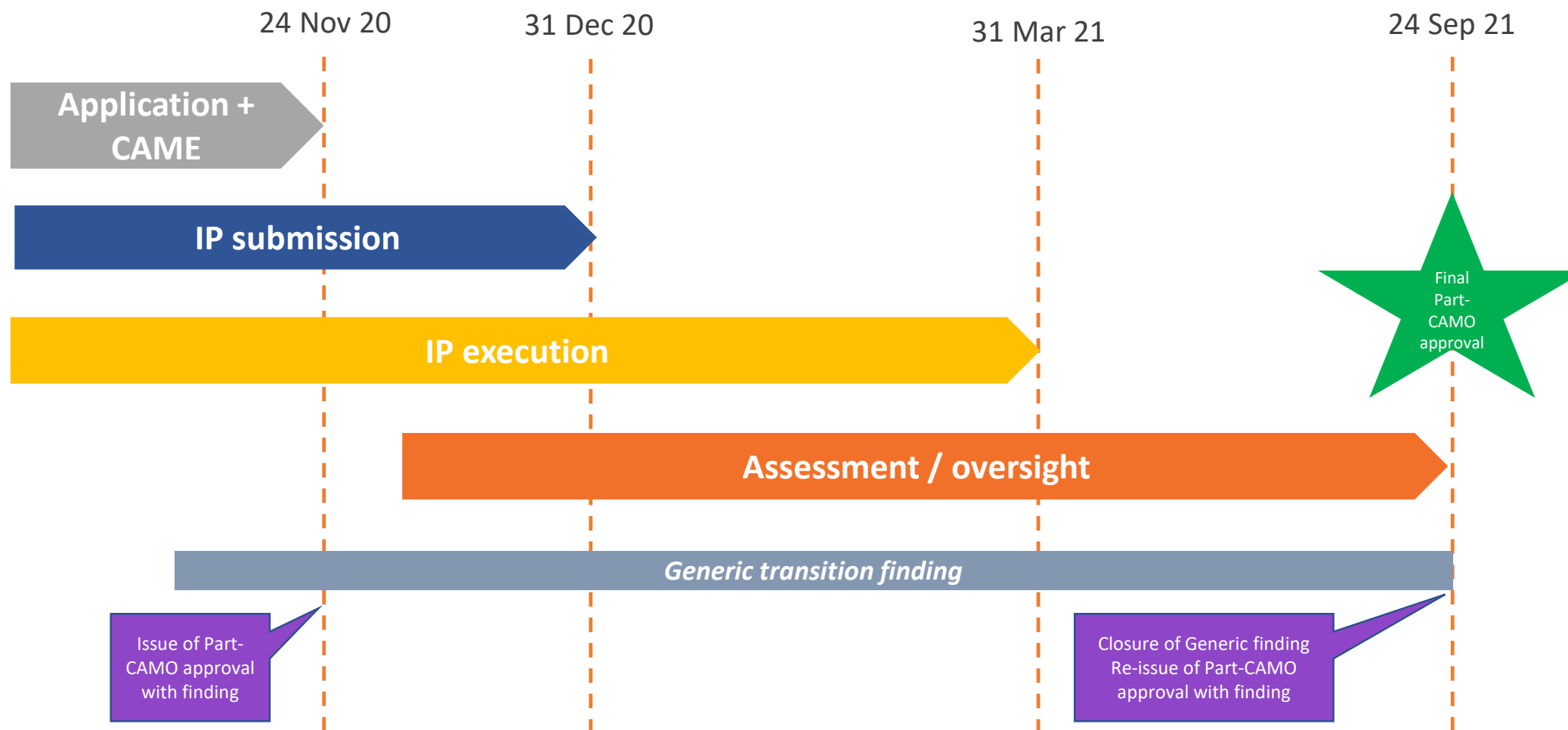
TRANSITION TO PART-CAMO

MACE / FOCG

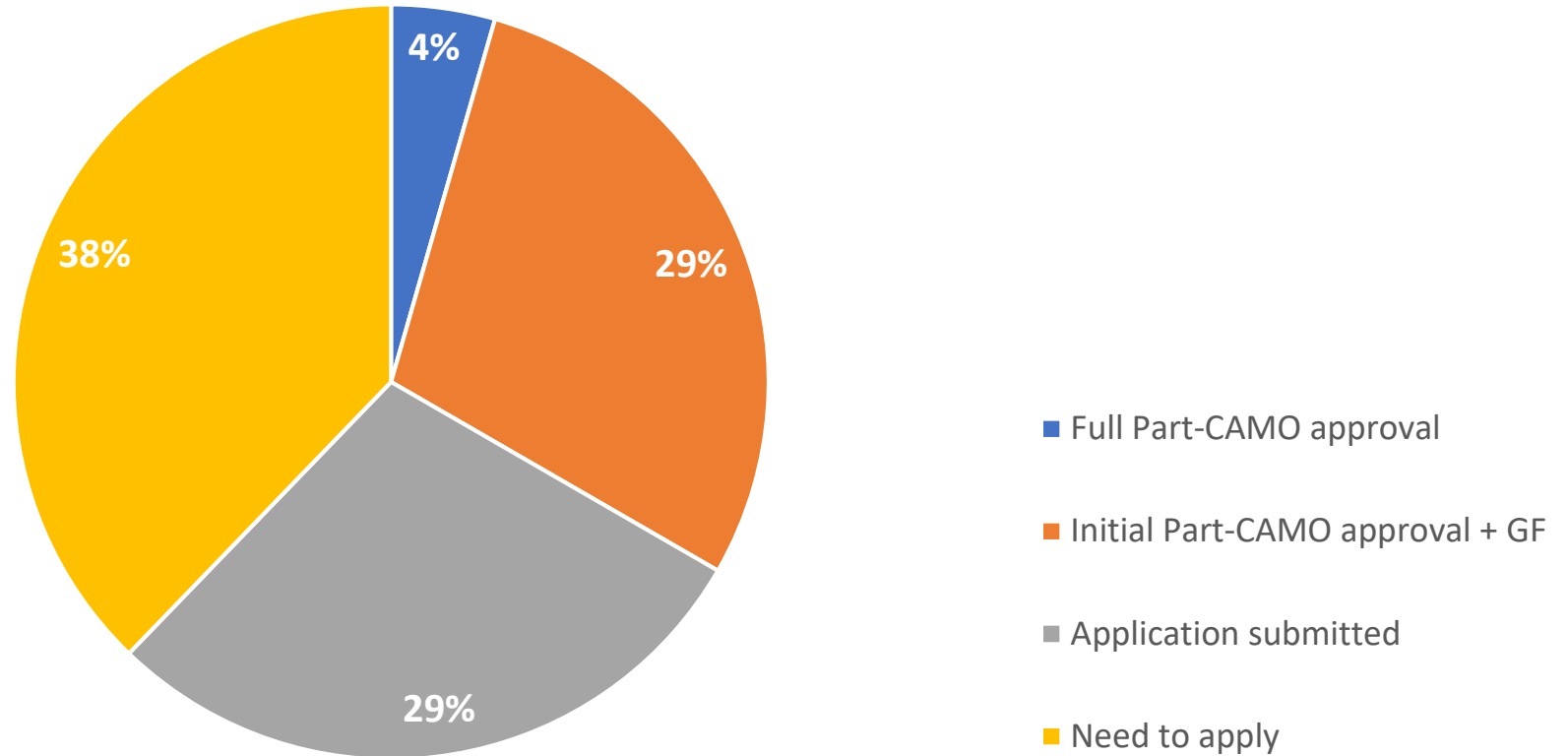
18th November 2020



Transport Malta



Where are we today?



24 Nov 20



Application +
CAME

- Applications to be submitted on Centrik Applications Tool (WI 06/2020)
 - EASA **Form 2**
 - Amended **CAME** [approval reference: from MT.MG.XX to MT.CAMO.XXXX]



What happens after submission of the application?

- **CAME approval**
(no verification of compliance with Part-CAMO)
- **EASA Form 14** certificate with the new approval number MT.CAMO.XXXX and same privileges already held by the organisation in accordance with Part-M.G and not exceeding the Part-CAMO defined privileges
(granted on grandfather rights, complemented by a generic transition finding)
- Part-MG approval certificate to be **surrendered** to TM CAD



What is this Generic Transition Finding?

- ***“On the basis of Article 4(5)) of Regulation (EU) No 1321/2014 (as amended), approval reference MT.CAMO.XXXX is issued to XYZ, but XYZ has not demonstrated that it complies with all requirements of Annex Vc (Part-CAMO) to Regulation (EU) No 1321/2014. XYZ shall take necessary measures to demonstrate to the satisfaction of TM CAD that, before 24 September 2021, it complies with the applicable requirements newly introduced by Part-CAMO and not included in Part-MG. To this end, XYZ should establish and communicate to TM CAD an implementation plan. In the meantime, XYZ shall continue working with the existing procedures as per the approved exposition amended to account for the new approval reference and amendments to Regulation (EU) No 1321/2014”.***



- Level 2 finding
- Raised and notified through **Centrik**:
 - *Action Plan Due By: 31 Dec 2020 (→ IP)*
 - *Closure Due By: 24 Sept 2021*
- **Existing oversight findings:** transferred to the equivalent Part-CAMO requirements (no change to the agreed closure date) or closed (if no equivalent requirement is available in Part-CAMO).

31 Dec 20



IP submission

- IP = response to the generic transition finding (*Corrective Action Plan*)
- Subject to TM CAD acceptance



What does TM CAD expect to see in the IP?

In simple words, the Implementation Plan will describe and document to TM CAD the **steps that you will take to successfully fill the gaps** with the new Part-CAMO requirements and close the generic transition findings.

The IP should therefore include:



- **Gap analysis** with Part-CAMO requirements (ref. Section 2 of WI 05/2020)
- Roadmap for achieving compliance – **what** are you going to do to fill the gap (CAME amendment, staff training, etc.), **by when** and **who** is responsible for it.

- TM CAD to adjust oversight planning cycle according to the IP
- Oversight in accordance with Part-CAMO
- Full compliance with Part-CAMO novelty assessed by 24 Sep 21

REMEMBER! You will have to submit your implementation plan to TM CAD by no later than **31 December 2020.**



... And happy new year!

31 Mar 21



IP execution

- Execution of accepted IP, including acquisition of necessary resources, CAME amendment and staff training.



What do we need to submit to TM CAD?

You will have to submit, as a minimum:

- **CAME**
(New Issue nr., Rev 0)
- **CAMO MS Assessment tool** (AITP-A08 Appendix 10)
- **Initial Safety Training material** and records



Don't forget that you will have to apply for the **acceptance of the nominated Safety Manager** (Form 4, qualifications, nomination letter, interview).



What kind of amendments are expected on the CAME?

- The CAME shall be amended in form and contents to reflect how the organisation will comply with Part-CAMO requirements
- Guidance: Section 3 of **WI 05/2020** + CAMO MS assessment tool
- The CAME shall be submitted to TM CAD for approval only after all required amendments have been made and is considered fully compliant with Part-CAMO.



What is the CAMO MS assessment tool and how should it be used?

- Devised to support AI in the evaluation of MS **implementation and maturity** (adaptation of EASA MS assessment tool to CAMO)
- Shared with the industry to aid implementation and continuous improvement of the MS
- It is not a checklist! Rather than evaluating compliance, it measures the level and maturity of the MS, contributing to its **continuous improvement**



Documented

Procedures and policies have been properly defined and described.

Implemented

Systems and procedures described are in use and outputs are produced.

Fully integrated

The outputs produced are vital elements of decision making processes and have a positive safety impact

SUITABLE → size, nature, complexity and risks (along all levels)



As a minimum, **at the end of the transition process the MS shall be PRESENT and SUITABLE.**

This means, that all required features must be present (properly documented) and suitable for the generic finding to be closed and the “final” Part-CAMO approval to be issued.



No finding will be raised during the transition process (initial approval) if one or more features of the MS are not operating.



However, **after the first oversight planning cycle, if one or more features of the MS are not operating, this will result in a finding.**

A feature which is not effective might result in an observation (it will never be a finding)

Specific to the organisation. The organisation has to confirm that the MS is suitable and justify it to TM CAD.

Annex 19 reference & text			
2.1.1 The service provider shall develop and maintain a process to identify hazards associated with its aviation products or services. Hazard identification shall be based on a combination of reactive and proactive methods.			
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a process that defines how reactive and proactive hazard identification is gathered from multiple sources (internal and external).		The hazards are identified and documented. Human and organisational factors related hazards are being identified.	The organisation has a register of the hazards that is maintained and reviewed to ensure it remains up to date. It is continuously and proactively identifying hazards related to its activities and operational environment and involves all key personnel and appropriate stakeholders. Hazards are assessed in a systematic and timely manner.
WHAT TO LOOK FOR			
<ul style="list-style-type: none"> Review how hazards are identified, analysed and recorded. Consider hazards related to: <ul style="list-style-type: none"> possible accident scenarios human and organisational factors business decisions and processes third party organisations. Review what internal and external sources of hazards are considered such as: Safety reports / audits / safety surveys / investigations / inspections / brainstorming / Management of Change activities / Commercial and other external influences etc. Investigations of safety occurrences establish causal/contributing factors (why it happened, not just what happened) and identify Human and organisational contributing factors. Hazards identified from occurrences are processed in compliance with Reg. (EU) 376/2014 Article 4 and 5. 			
Corresponding Part-CAMO requirements		CAME Ref.	
CAMO.A.200 'Management system' point (a)(3) AMC1 CAMO A 200(a)(3) 'Management system' point (a)		CAME 2.1, 2.2	
Remarks			

ICAO Annex 19 requirement

Level description

Guidance on items to be considered during assessment

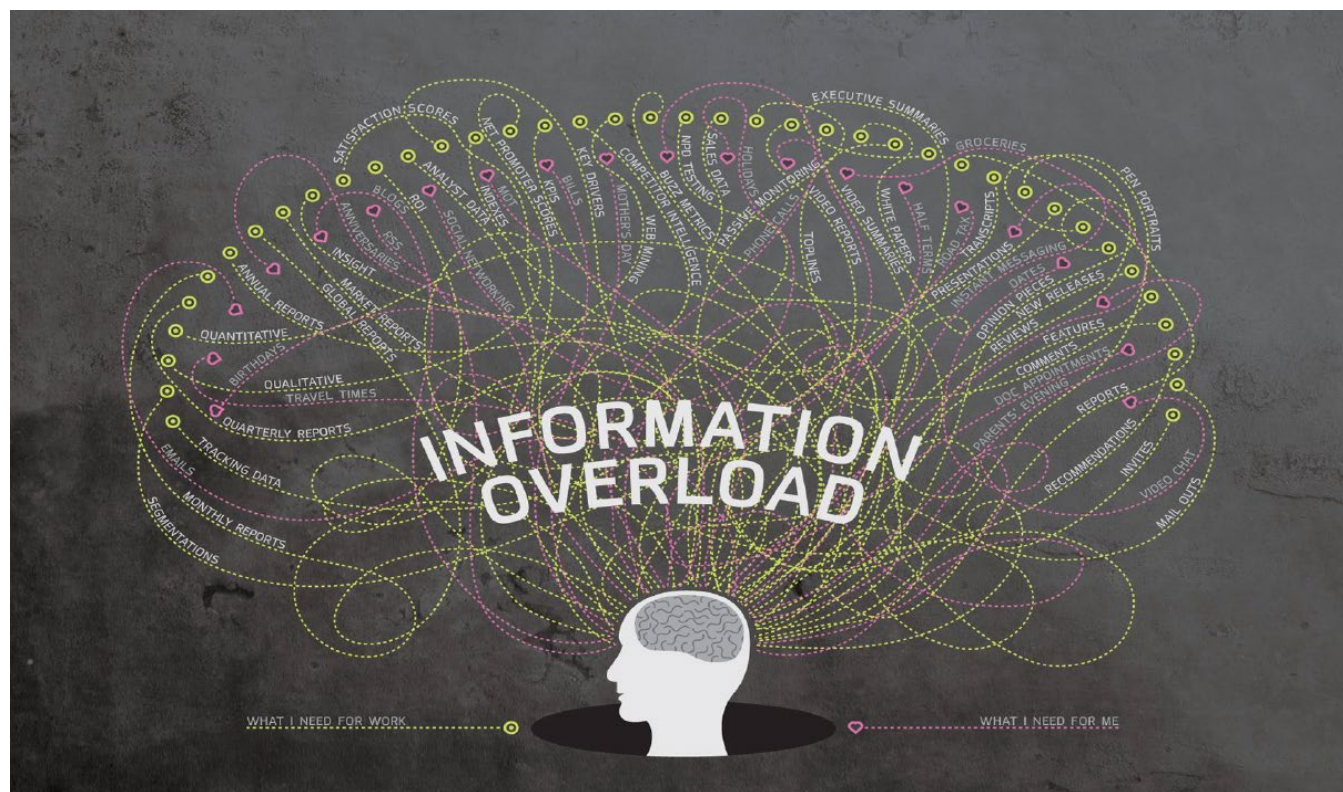
Part-CAMO and CAME reference Notes and substantiations



Is it better to go for internal or external safety training?

- Internal training:
 - instructor lead (instructor qualifications)
 - self-study (competence assessment)
- External training:
 - Evaluation of compliance with GM2 CAMO.A.305(g) (cross reference table)
 - Tailored topics: policy, MS structure, internal reporting, communication...
- Combination
 - Topic can be covered in different training courses (e.g. HF, SMS, initial training)

Keep it simple!



Safety Initial training is a powerful tool to involve your staff in the MS, initiate and consolidate an open reporting culture and build healthy safety culture.

Use it as such!



TM CAD checks that:

- The organisation is **compliant with Part-CAMO**
- All transition **findings** raised during the oversight have been **closed**
- The **implementation plan** has been **completed**

If all conditions above have been successfully verified, then TM CAD:

- Issues a recommendation report
- Approves the CAME
- Issue a revision of the EASA Form 14 updating the reference to the approved CAME
- Closes the *generic transition finding*



... And everybody is happy!

24 September 2021: END OF TRANSITION

- Part-M.G organisations which have initiated the transition to Part-CAMO but not completed it by 24 September 2021 shall be revoked, limited or suspended, in whole or in part.
- Part-M.G organisations which have not applied for Part-CAMO approval shall be revoked.



ANY QUESTIONS?

