

## Information and Advisory Notice No. 25

Issue No: 3 Dated: 25 May 2022

### Continuing Airworthiness Management Organisation (Part-CAMO)

#### Summary of revisions

Number	Reason
Issue 1	Initial issue
Issue 2	Clarification on the PART CAMO approval number
Issue 3	<b>Qualifications, Training and Experience Requirements for Safety Manager Manpower Planning Removal of Part-CAMO Transition provisions</b>

#### Introduction

Regulation ([EU 2019/1383](#) and [EU 2020/270](#) 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.

[IAN 24](#) already highlighted the main changes in Regulation (EU) No 1321/2014 and entry into force dates and transition.

**The scope of this IAN is not to substitute the AMC issued by EASA, but it is intended to supplement the AMCs, summarize and bring to the attention the most important issues, changes and additions which have an impact on Part-CAMO applicants and holders.**

### SECTION A – REGULATION AND AMC

The applicable headings for a Part-CAMO applicant are the following:

#### SECTION A — ORGANISATION REQUIREMENTS

- CAMO.A.005 Scope
- CAMO.A.105 Competent authority
- CAMO.A.115 Application for an organisation certificate

CAMO.A.120 Means of compliance  
CAMO.A.125 Terms of approval and privileges  
CAMO.A.130 Changes to the organisation  
CAMO.A.135 Continued validity  
CAMO.A.140 Access  
CAMO.A.150 Findings  
CAMO.A.155 Immediate reaction to a safety problem  
CAMO.A.160 Occurrence reporting  
CAMO.A.200 Management system  
CAMO.A.202 Internal safety reporting scheme  
CAMO.A.205 Contracting and subcontracting  
CAMO.A.215 Facilities  
CAMO.A.220 Record-keeping  
CAMO.A.300 Continuing airworthiness management exposition (CAME)  
CAMO.A.305 Personnel requirements  
CAMO.A.310 Airworthiness review staff qualifications  
CAMO.A.315 Continuing airworthiness management  
CAMO.A.320 Airworthiness review  
CAMO.A.325 Continuing airworthiness management data

### **CAMO.A.125 Terms of approval and privileges**

The privileges (previously M.A.711(b)) for conducting Airworthiness Reviews and issuing EASA Form 15b is now found in **CAMO.A.125(e)**.

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

Changes that affect the scope of approval, changes in the AM or the nominated personnel and the line of reporting to the AM, the operational address/es, changes to the procedure as regards changes not requiring prior approval shall be formalized with an application for approval change by submitting an [EASA Form 2](#) and any documentation relevant to the change in the approval as directed by TM CAD.

In the case of changes to the nominated persons, these persons would have to be nominated by the AM with a formal letter together with the CV with relevant qualifications, experience and attestations and the amended CAME.

The application for the amendment of an organisation certificate should be submitted at least 30 working days before the date of the intended changes.

In the case of a planned change of a nominated person, the organisation should inform the competent authority at least 20 working days before the date of the proposed change.

Unforeseen changes should be notified at the earliest opportunity, in order to enable the competent authority to determine whether there is continued compliance with the applicable requirements, and to amend, if necessary, the organisation certificate and related terms of approval.

**The organisation should manage the safety risks related to any changes to the organisation in accordance with AMC1 CAMO.A.200(a)(3) point (e). For changes requiring prior approval, it should conduct a risk assessment and submit it to TM CAD.**

## **CAMO.A.150 Findings**

This requirement states:

*The organisation shall:*

- (1) identify the root cause or causes of and contributing factors to the non-compliance;*
- (2) define a corrective action plan;*
- (3) demonstrate corrective action implementation to the satisfaction of TM CAD.*

This subject is of utmost importance in ensuring a smooth findings closure, continuation of approval and performance-based oversight planning considerations. As such we are hereby formulating our expected standards in the management of findings.

### **Definitions:**

**Correction:** action to eliminate a detected Finding. A correction can be made in advance of, in conjunction with or after a corrective action

**Corrective action:** action to eliminate the cause of a Finding and to prevent recurrence.

- There can be more than one cause for a nonconformity.
- Corrective action is taken to prevent recurrence whereas preventive action is taken to prevent occurrence.
- Corrective action is preceded by a root cause investigation.

**Preventive action:** action to eliminate the cause of a potential finding (Observation) or other potential undesirable situation (commercial).

- There can be more than one cause for a potential finding.
- Preventive action is taken to prevent occurrence whereas corrective action is taken to prevent recurrence.
- Comprehensive investigation is not required to identify possible causes but some improvements should be sought.

### **Closure of Findings by the Organisation**

The findings closure process shall be performed in a systematic manner following defined steps pursuant to the regulation and quality management standards.

### **Corrective Action**

Following the formal communication of the finding by the inspector, the audited organisation shall initiate the process by assigning the persons/group of persons responsible for each finding in order to:

1. Implement the **correction**, i.e the Immediate action to correct/contain the defect, mistake, omission or non-conformity especially in the case of a one-off occurrence, and
2. Define and implement the **corrective action** to eliminate the cause of a Finding and to prevent recurrence.

Corrective action for closure of finding can be divided in four stages:

- **Root cause analysis (RCA)**
- **Corrective action plan (CAP)**
- **Implementation of CAP (curative and preventive remedial action)**
- **Ex-post evaluation and verification of effectiveness of corrective action.**

In terms of compliance with the regulation the first three stages of the management of findings/non-conformities is the normal process for closure of a finding.

However ex-post this evaluation or verification, both internally and externally, could be in the form of a follow-up audit/ inspection.

### **Root Cause Analysis**

Root cause analysis is performed to identify the root cause of a finding especially when this is a systemic finding. This analysis can be performed using the **5 Whys** technique or any other suitable techniques such as Ishikawa/Fishbone etc. to determine possible contributing factors for lack of compliance with the requirements. This step shall be recorded by the organisation and presented to TM CAD upon request.

Possible Contributing factors for root cause of findings:

- i. Policies
- ii. Lack of Procedures
- iii. Lack of Knowledge
- iv. Lack of Experience
- v. Lack of Communication
- vi. Training
- vii. Facilities
- viii. Documentation Control
- ix. Environmental Conditions
- x. Competency Issues
- xi. Software Issues
- xii. Procedures not being followed
- xiii. Human Factors (Dirty Dozen)
- xiv. Omission
- xv. Violation
- xvi. One-off failure
- xvii. Quality Control

## xviii. Quality Assurance

The RCA will determine the extent of the CAP.

### **Corrective Action Plan**

The **corrective action plan** enables the auditee and auditor to understand and determine the remedial action and measures necessary to close the finding and be in compliance, with a proposal (plan).

### **Implementation of CAP**

The Remedial action is the implementation of the CAP by the auditee. Once the CAP is accepted by TM CAD, the auditee shall send the evidence of the corrective actions and any documents which require to be sent for review or approval within the acceptable timescales. In certain circumstances the Inspector may opt to verify closure in-situ.

Immediate **curative** corrective action to rectify the defect, mistake, omission or non-conformity especially in the case of a one-off occurrence, and

Long term **preventive** corrective action aimed at eliminating weaknesses in the system, preventing reoccurrence or at least mitigating the probability of reoccurrence through improved procedures, planning, training and checking.

It is recognised that some findings during the audits may be of a one-off nature on account of omissions or mistakes or other human factors issues during the performance of work. This means that the finding is not a systemic issue and may not require preventive corrective actions.

### **Ex-Post Evaluation and verification**

The ex-post evaluation of corrective actions is performance based, enforcing continued compliance and continuous improvement.

Internal and external verification and evaluation of the effectiveness of the preventive corrective actions and measures, both from the Quality Audit personnel and Airworthiness Inspector, could also be in the form of a **follow-up audit, inspection** or meeting.

### **Extension of Period of re-compliance**

In case where the audited organisation cannot ensure re-compliance with the regulations in the prescribed timescales, the organisation may ask for extension of the deadline for re-compliance. This shall be done in writing, duly providing justification for extension request, at least two weeks before the agreed deadline. The Airworthiness Inspector may issue the extension, once the Corrective Action Plan for closure of the finding has been accepted by TM CAD.

The extension of deadline of re-compliance shall be communicated by the Airworthiness Inspector to the applicable postholder/s or auditee. The extension shall be at the discretion of the inspector taking into consideration safety, technical and logistical implications of such extensions.

Both internal and external findings may identify risks and can be an indicator for Safety performance monitoring.

### **CAMO.A.155 Immediate reaction to a safety problem**

Upon the identification of a safety problem following either:

- results from routine scheduled or spot inspections and audits; or
- the receipt of a voluntary or occurrence report; or
- any safety-significant information issued by TM CAD or EASA, in the form of airworthiness or operational directives

The CAMO shall react in a structured and timely manner to mitigate or eliminate the safety risks.

### **CAMO.A.160 Occurrence reporting**

Occurrence reports shall be made using the CENTRIK Occurrence reporting platform used by TM CAD. For further information on the use of this platform please refer to the dedicated webpage in the TM CAD website <https://www.transport.gov.mt/aviation/safety-management/occurrence-reporting-3287>

CAMO.A.160 (a) makes reference to the requirements defined in **Regulation (EU) No 376/2014** on the reporting, analysis and follow-up of occurrences in civil aviation and **Implementing Regulation (EU) 2015/1018** laying down a list classifying occurrences in civil aviation to be mandatorily reported.

[AMC 20-8A](#) is applicable in order to determine when occurrences should be reported to EASA, competent authorities and other organisations.

### **CAMO.A.200 Management system**

The Requirements of the CAMO management system stem from the ICAO Doc 9898 Safety Management system is based on four pillars:

- 1. Safety Policy** - identification of safety objectives and implementation of policy through documented procedures and improvement.
- 2. Occurrence reporting** - internal reporting and occurrence reporting.
- 3. Safety Promotion** - Includes training, communication, and other actions to create a positive safety culture within all levels of the workforce
- 4. Safety Risk Management** - risk identification and mitigation.

The approach of Part-CAMO requirements is that the 'Management System' comprises also Compliance Monitoring. 'Compliance Monitoring' terminology is a replacement of the 'quality system' in Part-M.G.

CAMO.A.200 (c) and (d) state:

*(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.*

This means that Part-CAMOs Management System who are part of an AOC has to be integrated. This integration entails that various units within the AOC holder and TM CAD working together and adopting a more inclusive approach to comply with the requirements and to cover all the aspects of safety management within all the domains of an operation.

As the AMC states the organization may opt for the management system procedures to be incorporated into the Management System Manual. This means that the Part 2 of the CAME would have to be integrated in the Management System Manual.

The following are the CAME headings related to the Management system:

## **Part 2**

- 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 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 personnel
- 2.9 Control of personnel competency
- 2.10 Management system record-keeping
- 2.11 Occurrence reporting

In case this section is integrated in the Management System Manual, the CAME has to make clear reference to it for traceability and proper review and management of the procedures.

It is recognized that one size does not fit all and customization of the management system and its procedures in terms of the organisation size, complexity and working environment to enable a management system which is sustainable and effective.

**AMC1 CAMO.A.200(a)(3)** lists the SAFETY MANAGEMENT KEY PROCESSES:

- a) Hazard identification processes
- b) Risk management processes
- c) Internal investigation
- d) Safety performance monitoring and measurement
- e) Management of change
- f) Continuous improvement
- g) Immediate safety action and coordination with the operator's Emergency Response Plan (ERP)

As stated in **GM1 CAMO.A.200(a)(3) Management system** the Risk identification process extends to cover the overall control structure, and assesses in particular the following elements across all subcontract levels and all parties within such arrangements.

**GM2 CAMO.A.200(a)(3)** covers management of change scope and process.

**GM1 CAMO.A.200(a)(6)** refers to GM1 145.A.200(a)(6) and 145.B.300 for guidance material on the use of Information and Communication Technologies for performing remote audits,

### **CAMO.A.202 Internal safety reporting scheme**

The Part-CAMO shall put in place its safety policy commitment to apply 'just culture' principles to internal safety reporting and the investigation of occurrences and, in particular, not to make available or use the information on occurrences:

- (i) to attribute blame or liability to front line staff or other persons for actions, omissions or decisions taken by them that are commensurate with their experience and training; or
- (ii) for any purpose other than the maintenance or improvement of aviation safety.

This commitment shall be reflected in its procedures to ensure free and frank reporting of any potentially safety-related occurrence, including incidents such as errors or near misses, safety issues and hazards are identified.

**AMC1 CAMO.A.202** provides the elements of an internal safety reporting scheme of an organization.

### **CAMO.A.205 Contracting and subcontracting**

**AMC1 CAMO.A.125(d)(3) provides means of compliance related to CAM sub-contracting.**

In particular point (e) The CAMO's controls associated with subcontracted continuing airworthiness management tasks should be reflected in the associated contract and be in accordance with the CAMO policy and procedures defined in the CAME. When such tasks are subcontracted, the management system is considered to be extended to the subcontracted organisations.



The **AMC1 CAMO.A.125(d)(3)** also makes reference to active control of sub-contracting. Active control of tasks is understood to be quality control of tasks, sampling of tasks, signing-off of tasks and work orders, competence assessment of personnel over and above the requirements of compliance assurance and monitoring required by the management system.

### **AMC1 CAMO.A.125(d)(3)**

**Appendix II to AMC1 CAMO.A.125(d)(3) — Subcontracting of continuing airworthiness management tasks** contains the information and headings to be found in CAM sub-contracting agreement between a Part-CAMO and an organization performing CAM tasks.

The agreement shall have a document reference and revision status and be included in the CAME as an appendix. The CAME procedures shall clarify how active control of the CAM sub-contractors is exercised.

### **CAMO.A.220 Record-keeping**

**AMC1 CAMO.A.220(c)(1)(ii)** Record-keeping contains the minimum information required to be kept in respect of each airworthiness review staff.

### **CAMO.A.300 Continuing airworthiness management exposition (CAME)**

**AMC1 CAMO.A.300** provides an outline of the layout of an acceptable CAME containing the required parts and headings.

The CAME shall have the same structure and with the headings given by AMC1 CAMO.A.300, however additional heading(s) may be added when the organization wishes to add any special procedure related to its operation.

### **CAMO.A.305 Personnel requirements**

The Accountable Manager shall nominate persons or group of persons responsible to manage the organization.

The level of the KNOWLEDGE, BACKGROUND AND EXPERIENCE OF NOMINATED PERSON(S) shall be pursuant to the level stated in **AMC1 CAMO.A.305(c)**.

Paragraph (e) in AMC1 CAMO.A.305(c) states:

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

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, avionics 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.

For the person to be nominated in accordance with point (a)(4) or (a)(5) of point CAMO.A.305, in the case where the organisation holds one or more additional organisation certificates within the scope of Regulation (EU) 2018/1139 and that person has already an equivalent position (i.e. compliance monitoring manager, safety manager) under the additional certificate(s) held, the provisions set out in the first two paragraphs of point (e) may be replaced by the completion of a specific training programme acceptable to the competent authority to gain an adequate understanding of maintenance standards and continuing airworthiness concepts and principles.

So in the case of those operators who appoint / have a Safety Manager that does not satisfy the technical qualifications and/or experience the operator shall present a training programme for review and acceptance by TM CAD.

*The Training should be received 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 (if applicable),*
- *Maintenance Philosophies (Hard Time, Condition Monitoring, Trend Monitoring),*
- *Continuing airworthiness tasks and general principles,*
- *Continued airworthiness concepts and principles,*
- *Contracting and sub-contracting (Active Control),*
- *Maintenance standards and processes,*
- *Critical Maintenance Tasks and Error Capturing Methods,*
- *Aircraft Airworthiness Key Risk Elements (Appendix III to GM1 M.B.303(b)).*

*The SM should also have adequate knowledge of:*

- *Organisation's CAME,*  
| *Applicable regulations; (Regulations training in Part-M and Part-CAMO)*

TM CAD would accept OJT training undertaken under an AITMoC related to this AMC for another NSA previous to issue of ANNEX IV TO ED DECISION 2022/011/R in May 2022.

The Safety Manager OJT records shall be duly recorded and signed by the trainers and trainees. These shall be submitted together with the relevant training certificates to the AI as agreed with the AI agreed timescales.

**NOTE: The above CAMO.A.305 requirements apply also to those Safety Managers who already occupy this position within their organization. This means that where incompliance is identified OJT shall be undertaken.**

**GM3 CAMO.A.305(g) describes the competency criteria of the Safety Manager.**

**AMC4 CAMO.A.305(g) also covers training of compliance monitoring personnel:**

Those responsible for managing the compliance monitoring function should receive training on this task. Such training should cover the requirements of compliance monitoring, manuals and procedures related to the task, audit techniques, reporting, and recording.

The organization shall conduct a competency assessment of the nominated person based on the requirements of CAMO.A.305 (c), skills and aptitude of the nominee, the complexity, size and nature of operation of the organisation. This assessment shall be sent to TM CAD with the application.

Nominated persons would be accepted by TM CAD following an assessment process of the nomination of the person.

The CAM and Compliance manager within a Part CAMO need to assign a portion of their available time to the implementation and documentation of the safety management system. In large and medium sized organisations they will also be required to be part of the Safety Review Board. The origination manpower plan shall be reflecting these additional duties and increase of CAMO manpower might be required.

TM CAD has issued IAN 22 revision to address the competency assessment requirements for CAMO personnel.

**GM2 CAMO.A.305(g) Personnel requirements** contains a training syllabus for initial safety training

The topics are:

1. General/Introduction to safety management and HF
2. Safety Culture/Organisational factors
3. Human error
4. Human performance & limitations
5. Environment
6. Procedures, information, tools and practices
7. Communication
8. Teamwork
9. Professionalism and integrity
10. Organisation's safety programme

### **CAMO.A.305 (d) Manpower planning**

Manpower planning should be properly covered by the organization in the CAME. The manpower planning shall take into consideration the complexity and size of the organization, as well as the qualification level of the personnel involved. The manpower plan should aim at determining the manpower demand and the manpower capacity of the organization taking into consideration HF, efficiency, training requirements, sick and vacation leave etc.

It is advisable that the CAME makes reference to a manpower planning control document which is kept updated as deemed necessary by the organization.

### **CAMO.A.310 Airworthiness review staff qualifications**

**AMC1 CAMO.A.310** provide means of compliance of the qualification criteria of ARS in terms of experience, formal aeronautical training, qualifications and recency.

### **CAMO.A.315 Continuing airworthiness management**

**AMC2 CAMO.A.315(c)** refers to subcontracting of CAM tasks related to maintenance.

## SECTION B - INITIAL APPROVAL TO PART-CAMO

Due to the approval process and documental phase all new applications from the date of this IAN shall be submitted to TM CAD in accordance with Part-CAMO.

Applicant shall be made using [EASA Form 2](#)

The application package shall contain the following:

1. Company registration certificate;
2. A company board resolution nominating the Accountable Manager;
3. A letter from the Accountable Manager nominating the management team nominated persons (Continuing Airworthiness Manager, Safety Manager, ARS and Compliance Manager, as applicable)
  - a. CVs with relevant qualifications, experience and attestations.
  - b. Initial Competency Assessment of Managerial Team showing compliance with CAMO.A.305 and its AMCs;
4. Part-CAMO Compliance Checklist compiled and signed ([AITP-A08 Appendix IX](#));
5. Continuing Airworthiness Management Exposition (CAME) in compliance with CAMO.300 and its AMCs
6. Results of the pre-audit specified in point CAMO.A.115(b)(1),
7. Manpower Plan referred to in the CAME.

Note: functions related to compliance monitoring or safety management are combined subject to not resulting in any conflicts of interest;

Draft documents should be submitted at the earliest opportunity so that assessment of the application can begin. The initial certification or approval of changes cannot take place until TM CAD has received the completed documents.

The complete package shall be submitted to TMCAD at least 90 days prior the intend approval date;

Upon receiving an application for the initial issue of a certificate for an organisation, TM CAD will verify the organisation's compliance with the applicable requirements by:

- a) checking the organisation's documentation with the applicable requirements
- b) checking the eligibility of Nominated Persons for the proposed position by reviewing the documents submitted with the nominations. (point 3 above)
- c) once TM CAD is satisfied that the application and the supporting documentation, including the results of the pre-audit performed by the organisation, are in compliance with the applicable requirements TM CAD shall conduct an audit of the organisation, including interviews of the personnel, and inspections carried out at the organisation's facilities.
- d) a meeting with the accountable manager of the organisation shall be convened at least once during the evaluation for initial certification to ensure that he/she fully understands the significance of the

certification process and the reason for signing the statement of the organisation to comply with the procedures specified in the CAME.

- e) TM CAD shall confirm in writing all the findings raised during the verification to the organisation. For initial certification, all findings must be corrected to the satisfaction of TM CAD before the certificate can be issued.
- f) In the case of CAMO.A.125(e) privileges, TM CAD formally accepts the nominated ARS after satisfactory completion of an airworthiness review, having also satisfied the requirements of CAMO.A.310.
- g) In the case of CAM subcontracting as per CAMO.A.205 the organization shall submit an agreement based on Appendix II to AMC1 CAMO.A.125(d)(3) and conduct an audit of the sub-contractor to assess the capacity to discharge the responsibilities in the agreement.
- h) If an application for an organisation certificate is refused, the applicant should be informed of the right of appeal that exists under national law.