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Continuing Airworthiness Management Organisation (Part-CAMO)

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)

It also offers the view of TM CAD on the transition of existing continuing airworthiness organisations to the new Part-CAMO, based on Article 4 of Regulation (EU) No 1321/2014 as amended. (SECTION B & C)

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 and an EASA Form 4 signed by the nominee together with the CV with relevant qualifications, experience and attestations.

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 20-8 is still applicable.

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.

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).**

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. This shall be a TM CAD review item during the transition to Part CAMO. 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.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 - TRANSITION FROM PART-M.G. TO PART-CAMO

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

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

1. Part-M Subpart G to Part-CAMO, without limitations; or
2. Part-M Subpart G to Part-CAMO for non CMPA not used by licensed air carriers, without limitations or to Part-CAO with continuing airworthiness management only;

Note: no transition possible from Part-M Subpart F to Part- CAMO

Highlights:

- Part-M Subpart G organisations may continue their activities with the Part-MG approval only until the End of Transition (EoT) period **24 September 2021**.

- After 24 September 2021, there should be no more Part-M Subpart F and Part-M Subpart G organisations.

- Approvals to Part-M.G. may still be issued until 24-Sep-2020

- For existing Part-M Subpart G organisations the approval number (XXX) will remain and MG is to be replaced by CAMO, i.e MT.MG.XXX becomes MT.CAMO.XXX;

The 10 STEPS approach:

1- Eligibility to Part-CAMO

It is assumed that Part-MF and Part-MG organisations have prepared the necessary amendments to the exposition to be in compliance with Part-MF and Part-MG as amended (Reg. (EU) 2019/1383 and 2020/270).

The organisation reviews their eligibility to transit to Part-CAMO, analysing the existing (and future desired, where applicable) scope of work.

2- Application for Part-CAMO approval

The approved organisation requests a Part-CAMO approval to TM CAD using EASA Form 2 (TM/CAD/0041).

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.

TM CAD verifies the eligibility of the organisation, and if the organisation is eligible, informs the organisation of the future CAMO approval number/reference.

3- Exposition amendment

The organisation submits the amendment to the existing exposition to TM CAD for approval.
This amendment introduces:

- the changes necessary to comply with Part-MF/-MG as amended by Reg. (EU) 2019/1383 and 2020/270)
- the approval number/reference (MT.CAMO.[XXXX]) provided by TM CAD (step 2). This reference is to be introduced, in particular, EASA Form 15 organisation templates, CAME and other relevant documents/ forms.
- Once approved, the organisation uses this amended exposition until the reissue of the Part-CAMO certificate and the approval of the CAME (step 9).

4a - Initial CAMO approval

- TM CAD approves the amended exposition.

NOTE: TM CAD 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-CAMO at this stage.
The intent is to "grandfather" the existing organisation as a Part-CAMO organisation.
The organisation surrender the existing Part-MF/-MG certificate to TM CAD;

- TM CAD issues an 'EASA Form 14' certificate with the approval number/reference (MT.CAMO.[XXXX]) provided to the organisation at step 2. This certificate must reflect the same privileges as the ones held by the organisation under Part-MF/-MG and not exceed the Part-CAMO defined privileges;

4b- Finding notifications

TM CAD also:

- Notifies to the applicant a **'generic transition finding'**
- Transfer the open findings raised against Part-MF/-MG into 'oversight findings' against the relevant equivalent Part-CAMO requirements with no change in agreed closure dates.
  Remark: if no equivalent requirement exist in Part-CAMO, the finding should be closed without further showing.

5- Implementation plan

As a response to the 'generic transition finding', the organisation develops and submits an implementation plan that includes the following:

– Gap analysis between the existing organisation procedures and the new Part-CAMO requirements;
– A roadmap for developing the CAME (compliant with Part-CAMO);

– Training of staff on Part-CAMO and training on the future CAME.

6- Acceptance of the implementation plan and oversight programme adjustment

- TM CAD assess the implementation plan proposed by the organisation, and if the assessment concludes that it is sufficient to address the transition, accept this plan.
- TM CAD also review the existing oversight programme, considering the following:
  i. For requirements which are not new in Part-CAMO (i.e. for which there is an equivalent in Part-MF/-MG), TM CAD 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-CAMO requirements.
  ii. The current audit cycle may be continued, but the oversight programme should be reviewed to ensure that, before 24 September 2021, TM CAD will have checked compliance of the organisation against the Part-CAMO novelties (i.e. requirement which are newly introduced in Part-CAMO and for which there is no equivalent in Part-MF/-MG).

7- Oversight during transition

TM CAD continues to perform the oversight of the organisation, but in accordance with:

- Part-CAMO; -

- the implementation plan;
- the amended exposition.

8- Implementation plan execution

Organisation executes the implementation plan, including the acquisition of the necessary resource and the development of the CAME. It should be ensured that the staff receives difference training on the future approved CAME and associated procedures.

The drafting of the CAME should take into account the transition findings raised by TM CAD 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 CAME is considered fully compliant with Part-CAMO, it shall be submitted to TM CAD for approval.

9- Final CAMO approval

At this stage, TM CAD should have:
- checked compliance of the organisation against every Part-CAMO novelties
- checked that every 'transition finding' raised during oversight has been closed;
- implementation plan has been completed.

TM CAD issues a recommendation report, approves the CAME, issues a revision of the '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 CAME should be introduced.

10- End of transition and changes to organisation

At this stage, the organisation becomes a fully compliant Part-CAMO organisation and therefore the present guide, and 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-CAMO.

After 24 September 2021: Part-MF/-MG organisations which have initiated, but not completed the transition to Part-CAMO shall be revoked, limited or suspended, in whole or in part;

Part-MF/-MG organisations which have not applied to a Part-CAMO shall be revoked.

TM CAD PROPOSED TIMEFRAMES

The 10 steps approach do not have specific time frames to be complied with, however TM CAD suggest all organizations to complete step 1 to 3 by **24 November 2020.**

TM CAD will complete step 4a and 4b within 30 days upon the organization submits CAME iaw Step 3.

To avoid a peak of transition processes the organisations should submit the implementation plan to TM CAD by no later than 31 December 2020. This will allow possible adjustments to the plan prior its execution.

Every Part-M.G CAMO should apply for Part-CAMO approval by 24 November 2020. If a change in the approval scope is required after 24 September 2020 this must be done as per Part-CAMO.

SECTION C - INITIAL APPROVAL TO PART-CAMO

Approvals to Part-MF and Part-MG can only be issued until 24 September 2020 hence Part M applications shall be made using EASA Form 2.

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 with:
   a. EASA Form 4's of the nominated persons (Continuing Airworthiness Manager, Safety Manager, ARS and Compliance Manager, as applicable)
   b. CVs with relevant qualifications, experience and attestations.
   c. 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. Aircraft maintenance programmes;
7. results of the pre-audit specified in point CAMO.A.115(b)(1),

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 shall verify the organisation's compliance with the applicable by:

a) verify the organisation's documentation with the applicable requirements
b) verify eligibility of Nominated post holders for the proposed position by reviewing the documents submitted with the related EASA form 4. (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 investigation 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) If an application for an organisation certificate is refused, the applicant should be informed of the right of appeal that exists under national law.