EUROPEAN MILITARY AIRWORTHINESS REQUIREMENT

EMAR CAMO

AMC & GM

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STATUS

The Status of the document can take 3 values:

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EDITION

The Edition Number will take the following format: **Edition X.YY**:

The **value of X** will change after a **major** revision of the document

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NOTE:

This EMAR AMC & GM relies on definitions laid down in EMAD 1.

This EMAR AMC & GM relies on the EASA “Easy Access Rules for Continuing Airworthiness (Regulation (EU) No 1321/2014)” published in July 2021.

The Forms referred to in this document can be found in the EMAR Forms document.

The term “contract” covers all types of written arrangements within military context (e.g. arrangement, tasking, agreement).

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ACCEPTABLE MEANS OF COMPLIANCE & GUIDANCE MATERIAL

GENERAL

GM1 to EMAR CAMO Definitions

Audit	refers to a systematic, independent, and documented process for obtaining evidence, and evaluating it objectively to determine the extent to which requirements are complied with. Note: Audits may include inspections.
Alternative means of compliance	are those means that propose an alternative to an existing AMC or those that propose new means to establish compliance with EMARs for which no associated AMC have been adopted by the NMAA.
Assessment	in the context of management system performance monitoring, continuous improvement and oversight, refers to a planned and documented activity performed by competent personnel to evaluate and analyse the achieved level of performance and maturity in relation to the organisation's policy and objectives. Note: An assessment focuses on desirable outcomes and the overall performance, looking at the organisation as a whole. The main objective of the assessment is to identify the strengths and weaknesses to drive continual improvement. Remark: For 'risk assessment', please refer to the definition below.
Competency	is a combination of individual skills, practical and theoretical knowledge, attitudes, training, and experience.
Correction	is the action to eliminate a detected non-compliance.
Corrective action	is the action to eliminate or mitigate the root cause(s) and prevent the recurrence of an existing detected non-compliance, or other undesirable conditions or situations. Proper determination of the root cause(s) is crucial for defining effective corrective actions to prevent reoccurrence.
Error	is an action or inaction by a person that may lead to deviations from accepted procedures or regulations. Note: Errors are often associated with occasions where a planned sequence of mental or physical activities either fails to achieve its intended outcome, or is not appropriate with regard to the intended outcome, and when results cannot be attributed purely to chance
Hazard	is a condition or an object with the potential to cause or contribute to an aircraft incident or accident.
Human factors	is anything that affects human performance, which means principles that apply to aeronautical activities, and which seek safe interface between the human and other system components by proper

	consideration of human performance.
Human performance	refers to human capabilities and limitations which have an impact on the safety and efficiency of aeronautical activities.
Inspection	in the context of compliance monitoring and oversight, refers to an independent documented conformity evaluation by observation and judgement accompanied, as appropriate, by measurement, testing or gauging, in order to verify compliance with applicable requirements. Note: Inspection may be part of an audit (e.g. product audit), but may also be conducted outside the normal audit plan; for example, to verify closure of a particular finding.
Just Culture	means a culture in which front-line operators or other persons are not punished for actions, omissions or decisions taken by them that are commensurate with their experience and training, but in which gross negligence, wilful violations and destructive acts are not tolerated.
Near-miss	is an event in which an occurrence to be mandatorily reported according to national regulations was narrowly averted or avoided. Example: A CAMO staff on rechecking his/her work at the end of a task realises that an AD, AWL, CMR task was not properly processed (for instance, in the AMP or continuing airworthiness record system) which would have led to a situation that the AD/AWL/CMR would not have been performed on time on the affected (fleet of) aircraft.
Organisational factor	is a condition that affects the effectiveness of safety risk controls, related to the culture, policies, processes, resources, and workplace of an organisation.
Oversight planning cycle	refers to the time frame within which all areas of the approval and all processes should be reviewed by the NMAA by means of audits and inspections.
Oversight programme	refers to the detailed oversight schedule that defines the number of audits and inspections, the scope and duration of each audit and inspection, including details of product audits and locations, as appropriate, to be performed by the NMAA, and the tentative time frame for performing each audit and inspection.
Post holder(s)	means the person(s) nominated in accordance with EMAR CAMO.A.305(b)(2).
Preventive action	is the action to eliminate the cause of a potential non-compliance, or other undesirable potential situation.
Risk assessment	is an evaluation based on engineering and operational judgement and/or analysis methods in order to establish whether the achieved or perceived risk is acceptable or tolerable.
Safety Culture	is an enduring set of values, norms, attitudes, and practices within an organisation concerned with minimising the exposure of the workforce and the general public to dangerous or hazardous conditions. In a positive safety culture, a shared concern for, commitment to, and accountability for safety is promoted.

Safety risk	refers to the predicted probability and severity of the consequences or outcomes of a hazard.
Safety training	refers to dedicated training to support safety management policies and processes, including human factors training. Note: The main purpose of the safety training programme is to ensure that personnel at all levels of the organisation maintain their competency to fulfil their roles safely. Safety training should, in particular, consider the safety knowledge derived from hazard identification and risk management processes, and support the fostering of a positive safety culture. Note: Safety management training refers to specific training for the staff involved in safety management functions in accordance with EMAR CAMO.A.200(a)(3) or EMAR CAMO.A.305(a)(5).

SECTION A – ORGANISATION REQUIREMENTS

AMC1 CAMO.A.115 Application for an organisation certificate

An application should be made on an EMAR Form 2 (Appendix I to AMC1 CAMO.A.115) or an equivalent form that is acceptable to the NMAA. EMAR Form 2 is also valid for application for other types of organisations pursuant to EMARs. Organisations that apply for several certificates may do so using a single EMAR Form 2.

AMC2 CAMO.A.115 Application for an organisation certificate

GENERAL

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

(b) This information, including the results of the pre-audit specified in EMAR CAMO.A.115(b)(1), will enable the NMAA to conduct its assessment in order to determine the volume of certification and oversight work that is necessary, and the locations where it will be carried out.

(c) The intent of the internal pre-audit referred to in EMAR CAMO.A.115(b)(1) is to ensure that the organisation has internally verified its compliance with EMAR M and EMAR CAMO. This should allow the organisation to demonstrate to the NMAA the extent to which the applicable requirements are complied with, and to provide assurance that the organisation management system is established to a level that is sufficient to perform continuing airworthiness management activities.

GM1 CAMO.A.115(b) Application for an organisation certificate

PROCEDURE FOR CHANGES NOT REQUIRING PRIOR APPROVAL

The procedure for changes not requiring prior approval should include, as mentioned in EMAR CAMO.A.300(a)(11)(iv), both the scope of those changes and how they will be managed and notified.

For applicants for an initial certificate, the scope may be limited by the NMAA for the first period of operation. An extension of such a limited scope may be considered later; see GM1 CAMO.A.130.

AMC1 CAMO.A.115(b)(2) Application for an organisation certificate

DOCUMENTATION FOR DEMONSTRATION OF COMPLIANCE

(a) Documentation to be provided to the NMAA in the frame of an application for an initial EMAR CAMO certificate should include, as a minimum:

- the Continuing Airworthiness Management Exposition (CAME), containing in particular:

  − the description of the Aircraft Technical Log system;

  − the technical content of the contract between the CAMO and the organisation subcontracted to carry out continuing airworthiness management tasks, when such arrangement exists.

- the Aircraft Maintenance Programme (AMP);
- any additional document requested by the NMAA.

(b) Upon request by the NMAA, the CAMO should be able to demonstrate that arrangements are in place for all base and scheduled line maintenance for an appropriate period of time.

AMC1 CAMO.A.125(d)(3) Terms of approval and privileges

SUBCONTRACTING OF CONTINUING AIRWORTHINESS MANAGEMENT TASKS

(a) The CAMO may subcontract certain continuing airworthiness management tasks to qualified organisations. The subcontracted organisation performs the continuing airworthiness management tasks as an integral part of the CAMO's management system, irrespective of any other approval held by the subcontracted organisation (including EMAR CAMO or EMAR 145 approval).

(b) The CAMO remains accountable for the satisfactory completion of the continuing airworthiness management tasks irrespective of any contract that may be established.

(c) In order to fulfil this responsibility, the CAMO should be satisfied that the actions taken by the subcontracted organisation meet the standards required by EMAR CAMO. Therefore, the CAMO management of such activities should be accomplished:

(1) by active control through direct involvement; and/or

(2) by endorsing the recommendations made by the subcontracted organisation.

(d) In order to retain ultimate responsibility, the CAMO should limit subcontracted tasks to the activities specified below:

(1) Airworthiness Directive analysis and planning;

(2) Service Bulletin analysis;

(3) planning of maintenance;

(4) reliability monitoring, health monitoring;

(5) Aircraft Maintenance Programme development and amendments;

(6) any other activities, which do not limit the CAMO responsibilities, as agreed by the NMAA.

(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.

(f) With the exception of engines and Auxiliary Power Units, contracts would normally be limited to one organisation per aircraft type for any combination of the activities described in Appendix II to AMC1 CAMO.A.125(d)(3). Where contracts are made with more than one organisation, the CAMO should demonstrate that adequate coordination controls are in place and that the individuals' responsibilities are clearly defined in the related contracts.

(g) Contracts should not authorise the subcontracted organisation to subcontract to other organisations elements of the continuing airworthiness management tasks.

(h) The NMAA should exercise oversight of the subcontracted activities through the CAMO approval. The contracts should be acceptable to the NMAA. The CAMO should only subcontract to organisations which are specified by the NMAA on EMAR Form 14.

(i) The subcontracted organisation should agree to notify the CAMO of any changes affecting the contract as soon as practical. The CAMO should then inform its NMAA. Failure to do so may invalidate the NMAA's acceptance of the contract.

(j) Appendix II to AMC1 CAMO.A.125(d)(3) provides information on the subcontracting of continuing airworthiness management tasks.

GM1 CAMO.A.125(e) Terms of approval and privileges

(a) An organisation may be approved for the privileges of EMAR CAMO.A.125(d) only, without the privilege to carry out airworthiness reviews. In this case, the airworthiness review can be contracted to another organisation approved for the same aircraft type.

(b) In order to be approved for the privileges of EMAR CAMO.A.125(e) for a particular aircraft type, it is necessary to be approved for the privileges of EMAR CAMO.A.125(d) for that aircraft type.

(c) Nevertheless, this does not necessarily mean that the organisation needs to be currently managing a particular aircraft type in order to be able to perform airworthiness reviews on that aircraft type. The organisation may be performing only airworthiness reviews on an aircraft type without having any customer under contract for that type.

(d) Furthermore, this situation should not necessarily lead to the removal of the aircraft type from the organisation approval. As a matter of fact, since in most cases the Airworthiness Review Staff (ARS) are not involved in continuing airworthiness management activities, it cannot be argued that these ARS are going to lose their skills just because the organisation is not managing a particular aircraft type. The important issue in relation to maintaining a particular aircraft type in the organisation approval is whether the organisation continuously fulfils all the EMAR CAMO requirements (facilities, documentation, qualified personnel, management system, etc.) required for initial approval.

GM1 CAMO.A.125(f) Terms of approval and privileges

The sentence 'for the particular aircraft for which the organisation is approved to issue the Military Airworthiness Review Certificate (MARC) contained in EMAR CAMO.A.125(f) means that:

− the Military Permit to Fly can only be issued for aircraft which are in a controlled environment and are managed by that CAMO;

− NOT APPLICABLE.

AMC1 CAMO.A.130 Changes to the organisation

APPLICATION TIME FRAMES

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

(b) In the case of a planned change of a nominated person, the organisation should inform the NMAA at least 20 working days before the date of the proposed change.

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

AMC2 CAMO.A.130 Changes to the organisation

MANAGEMENT OF CHANGES

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 provide it to the NMAA upon request.

GM1 CAMO.A.130 Changes to the organisation

CHANGES REQUIRING OR NOT REQUIRING PRIOR APPROVAL

The rule point EMAR CAMO.A.130 is structured as follows:

− Point (a) introduces an obligation of prior approval (by the NMAA) for specific cases listed under (1) to (4).

− Point (b) address all instances (including (a)) where EMAR CAMO explicitly requires an approval by the NMAA (e.g. CAME procedure for the completion of an airworthiness review under supervision, ref. EMAR 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 EMAR CAMO.

− Point (b) also indicates how all changes requiring prior approval are to be handled.

− Point (c) introduces the possibility to agree with the NMAA 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.

GM1 CAMO.A.130(a)(1) Changes to the organisation

CHANGES THAT AFFECT THE SCOPE OF THE CERTIFICATE OR THE TERMS OF APPROVAL

Typical examples of such changes are listed below (not exhaustive):

(1) the name of the organisation;

(2) the organisation’s principal place of activities;

(3) additional aircraft type/model/series;

(4) the accountable manager referred to in EMAR CAMO.A.305(a);

(5) additional subcontracted organisation.

GM2 CAMO.A.130(a)(1) Changes to the organisation

CHANGE OF THE NAME OF THE ORGANISATION

A change of the name requires the organisation to submit a new application as a matter of urgency.

If this is the only change to report, the new application can be accompanied by a copy of the documentation that was previously submitted to the NMAA under the previous name, as a means of demonstrating how the organisation complies with the applicable requirements.

GM1 CAMO.A.130(b) Changes to the organisation

CHANGES REQUIRING PRIOR APPROVAL (OTHER THAN THOSE COVERED BY EMAR CAMO.A.130(a))

Following are some examples of changes that require prior approval by the NMAA (other than covered by EMAR CAMO.A.130(a)), as specified in the applicable EMAR CAMO requirements:

(a) changes to the alternative means of compliance [EMAR CAMO.A.120(b)].

(b) changes to the CAME procedure for the completion of an airworthiness review under supervision of the organisation's authorised ARS [EMAR CAMO.A.310(c)].

(c) changes to the procedure to establish and control the competency of personnel [EMAR CAMO.A.305(g)].

(d) changes to the system for reporting to the NMAA on the safety performance and regulatory compliance of the organisation (in the case of an extension beyond 36 months of the oversight planning cycle) [EMAR CAMO.B.305(d)].

(e) changes to the procedure for the indirect approval of the AMP [EMAR M.A.302(c)].

AMC1 CAMO.A.150 Findings

GENERAL

The action plan defined by the organisation should address the effects of the non-compliance, as well as its root cause(s) and contributing factor(s).

Depending on the issues, the action plan should address correction/containment of the issue, corrective action and preventive action.

GM1 CAMO.A.150 Findings

CAUSAL ANALYSIS

(a) It is important that the analysis does not primarily focus on establishing who or what caused the non-compliance, but on why it was caused. Establishing the root cause or causes of a non-compliance often requires an overarching view of the events and circumstances that led to it, to identify all the possible systemic and contributing factors (regulatory, human factors (HF), organisational factors, technical, etc.) in addition to the direct factors.

(b) A narrow focus on single events or failures, or the use of a simple, linear model, such as a fault tree, to identify the chain of events that led to the non-compliance, may not properly reflect the complexity of the issue, and therefore there is a risk that important factors that must be addressed in order to prevent a reoccurrence will be ignored.

Such an inappropriate or partial causal analysis often leads to defining 'quick fixes' that only address the symptoms of the non-compliance. A peer review of the results of the causal analysis may increase its reliability and objectivity.

(c) A system description of the organisation that considers the organisational structures, processes and their interfaces, procedures, staff, equipment, facilities and the

environment in which the organisation operates, will support both effective causal (reactive) and hazard (proactive) analyses.

AMC1 CAMO.A.160 Occurrence reporting

GENERAL

(a) Where the organisation holds one or more additional organisation certificates within the scope of EMARs:

(1) the organisation may establish an integrated occurrence reporting system covering all certificate(s) held; and

(2) single reports for occurrences should only be provided if the following conditions are met:

(i) the report includes all relevant information from the perspective of the different organisation certificates held;

(ii) the report addresses all relevant specific mandatory data fields and clearly identifies all certificate holders for which the report is made;

(iii) the NMAA for all certificates is the same and such single reporting was agreed with that NMAA.

(b) The organisation should assign responsibility to one or more suitably qualified persons with clearly defined authority, for coordinating action on airworthiness occurrences and for initiating any necessary further investigation and follow-up activity.

(c) If more than one person are assigned such responsibility, the organisation should identify a single person to act as the main focal point for ensuring a single reporting channel is established with the accountable manager. This should in particular apply to organisations holding one or more additional organisation certificates within the scope of EMARs where the occurrence reporting system is fully integrated with that required under the additional certificate(s) held.

AMC2 CAMO.A.160 Occurrence reporting

The organisation should share relevant safety-related occurrence reports with the design approval holder of the aircraft in order to enable it to issue appropriate service instructions and recommendations to all Operating Organisations. Liaison with the design approval holder is recommended to establish whether published or proposed service information will resolve the problem or to obtain a solution to a particular problem.

GM1 CAMO.A.160 Occurrence reporting

MANDATORY REPORTING – GENERAL

(a) NOT APPLICABLE.

(b) EMAD-20 “On the use of EASA’s General Acceptable Means of Compliance for Airworthiness of Products, Parts and Appliances (AMC 20) in the Military Environment” provides further details on occurrence reporting (EMAD 20-8 refers).

GM1 CAMO.A.160(b) Occurrence reporting

DESIGN APPROVAL HOLDER

Depending on the case, the 'organisation responsible for the design of the aircraft' will be the holder of a type-certificate, a restricted type-certificate, a supplemental type-certificate, a Military Technical Standard Order (MTSO) authorisation, an approval for a repair or a change to the type design or any other relevant approval or authorisation for products, parts and appliances deemed to have been issued under EMAR 21.

GM1 CAMO.A.200 Management system

GENERAL

Safety management seeks to proactively identify hazards and to mitigate the related safety risks before they result in aviation accidents and incidents. Safety management enables an organisation to manage its activities in a more systematic and focused manner. When an organisation has a clear understanding of its role and contribution to aviation safety, it can prioritise safety risks and more effectively manage its resources and obtain optimal results.

The principles of the requirements in EMAR CAMO.A.200, EMAR CAMO.A.202, EMAR CAMO.A.205 and the related AMC constitute the framework for military aviation safety management. This framework addresses the core elements of the ICAO safety management system (SMS) framework defined in Appendix I to Annexes B and C – Policy on Safety Management System (SMS) of BFD and it promotes an integrated approach to the management of an organisation. It facilitates the introduction of the additional safety management components, building upon the existing management system, rather than adding them as a separate framework.

This approach is intended to encourage organisations to embed safety management and risk-based decision-making into all their activities, instead of superimposing another system onto their existing management system and governance structure. In addition, if the organisation holds multiple EMAR organisation certificates, it may choose to implement a single management system to cover all of its activities. An integrated management system may not only be used to capture multiple certification requirements, but also to cover other management systems such as security, occupational health and environmental management systems. Integration will remove any duplication and exploit synergies by managing safety risks across multiple activities. Organisations may determine the best means to structure their management systems to suit their business and organisational needs.

The core part of the management system framework (EMAR CAMO.A.200) focuses on what is essential for safety management, by mandating the organisation to:

(a) clearly define accountabilities and responsibilities;

(b) establish a safety policy and the related safety objectives;

(c) implement safety reporting procedures in line with just culture principles;

(d) ensure the identification of military aviation safety hazards entailed by its activities, ensure their evaluation, and the management of associated risks, including:

  (1) taking actions to mitigate the risks;

  (2) verifying the effectiveness of the actions taken to mitigate the risks;

(e) monitor compliance, while considering any additional requirements that are applicable to the organisation;

(f) keep their personnel trained, competent, and informed about significant safety issues; and

(g) document all the key management system processes.

Compared to the previous EMAR M Subpart G quality system 'framework', the new elements that are introduced with EMAR CAMO are, in particular, those addressed under points (b) to (d). Points (c) and (d)(1) address the 'Safety Risk Management' element of the Appendix I to Annexes B and C – Policy on Safety Management System (SMS) of BFD. Points (d)(2) and (e) address the 'Safety Assurance' element thereof.

EMAR CAMO.A.200 defines the following as key safety management processes; these are further specified in the related AMC and GM:

- Hazard identification;
- Safety risk management;
- Internal investigation;
- Safety performance monitoring and measurement;
- Management of change;
- Continuous improvement;
- Immediate safety action and coordination with the aircraft Operating Organisation.

It is important to recognise that safety management will be a continuous activity, as hazards, risks and the effectiveness of safety risk mitigations will change over time.

These key safety management processes are supported by a compliance monitoring function as an integral part of the management system for safety. Most military aviation safety requirements constitute generic safety risk controls established by the NMAA. Therefore, ensuring effective compliance with the requirements during daily operations and independent monitoring of compliance are fundamental to any management system for safety. The compliance monitoring function may, in addition, support the follow-up of safety risk mitigation actions. Moreover, where non-compliances are identified through internal audits, the causes will be thoroughly assessed and analysed. Such an analysis in return supports the risk management process by providing insights into causal and contributing factors, including HF, organisational factors and the environment in which the organisation operates. In this way, the outputs of compliance monitoring become some of the various inputs to the safety risk management functions. On the other hand, the safety risk management processes may be used to determine focus areas for compliance monitoring. In this way, internal audits will inform the organisation's management of the level of compliance within the organisation, whether safety risk mitigation actions have been implemented, and where corrective or preventive action is required. The combination of safety risk management and compliance monitoring should lead to an enhanced understanding of the end-to-end process and the process interfaces, exposing opportunities for increased efficiencies, which are not limited to safety aspects.

As military aviation is a complex system with many organisations and individuals interacting together, the primary focus of the key safety management processes is on the organisational processes and procedures, but it also relies on the humans in the system. The organisation and the way in which it operates can have a significant impact on human performance. Therefore, safety management necessarily addresses how humans can contribute both positively and negatively to an organisation's safety outcomes, recognising that human behaviour is influenced by the organisational environment.

The effectiveness of safety management largely depends on the degree of commitment of the senior management to create a working environment that optimises human performance and encourages personnel to actively engage in and contribute to the organisation's management processes. Similarly, a positive safety culture relies on a high degree of trust and respect between the personnel and the management, and it must therefore be created and supported at the senior management level. If the management does not treat individuals who identify hazards and report adverse events in a consistently fair and just way, those individuals are unlikely to be willing to communicate safety issues or to work with the management to effectively address the safety risks. As with trust, a positive safety culture takes time and effort to establish, and it can be easily lost.

It is further recognised that the introduction of processes for hazard identification and risk assessment, mitigation and verification of the effectiveness of such mitigation actions may create immediate and direct costs, while related benefits are sometimes intangible and may take time to materialise. Over time, an effective management system will not only address the risks of major occurrences, but also identify and address production inefficiencies, improve communication, foster a better organisation culture, and lead to more effective control of contractors and suppliers. In addition, through an improved relationship with the NMAA, an effective management system may result in a reduced oversight burden.

Thus, by viewing safety management and the related organisational policies and key processes as items that are implemented not only to prevent incidents and accidents, but also to meet the organisation's strategic objectives, any investment in safety should be seen as an investment in productivity and organisational success.

AMC1 CAMO.A.200(a)(1) Management system

ORGANISATION AND ACCOUNTABILITIES

(a) The management system should encompass safety by including a safety manager, and a safety review board in the organisational structure. The functions of the safety manager are those defined in AMC1 CAMO.A.305(a)(4);(a)(5).

(b) Safety review board:

(1) The safety review board should be a high-level committee that considers matters of strategic safety in support of the accountable manager's safety accountability.

(2) The board should be chaired by the accountable manager and composed of the person or group of persons nominated under EMAR CAMO.A.305(a) and (b).

(3) The safety review board should monitor:

(i) safety performance against the safety policy and objectives;

(ii) that any safety action is taken in a timely manner; and

(iii) the effectiveness of the organisation's management system processes.

(4) The safety review board may also be tasked with:

(i) reviewing the results of compliance monitoring;

(ii) monitoring the implementation of related corrective and preventive actions.

(c) The safety review board should ensure that appropriate resources are allocated to achieve the established safety objectives.

(d) The safety manager or another person designated by the safety manager may attend, as appropriate, safety review board meetings. He or she may communicate to the accountable manager all information, as necessary, to allow decision-making based on safety data.

(e) Notwithstanding point (a), where justified by the size of the organisation and the nature and complexity of its activities and subject to a risk assessment and agreement by the NMAA, the organisation may not need to establish a formal safety review board. In this case, the tasks normally allocated to the safety review board should be allocated to the safety manager.

GM1 CAMO.A.200(a)(1) Management system

SAFETY ACTION GROUP

(a) Depending on the size of the organisation and the nature and complexity of its activities, a safety action group may be established as a standing group or as an ad hoc group to assist, or act on behalf of the safety manager or the safety review board.

(b) More than one safety action group may be established, depending on the scope of the task and the specific expertise required.

(c) The safety action group usually reports to, and takes strategic direction from, the safety review board, and may be composed of managers, supervisors and personnel from concerned services.

(d) The safety action group may be tasked with or assist in:

(1) monitoring safety performance;

(2) defining actions to control risks to an acceptable level;

(3) assessing the impact of organisational changes on safety;

(4) ensuring that safety actions are implemented within agreed timescales;

(5) reviewing the effectiveness of previous safety actions and safety promotion.

GM2 CAMO.A.200(a)(1) Management system

MEANING OF THE TERMS ‘ACCOUNTABILITY’ AND ‘RESPONSIBILITY’

In the English language, the notion of accountability is different from the notion of responsibility.

Whereas ‘accountability’ refers to an obligation which cannot be delegated, ‘responsibility’ refers to an obligation that can be delegated.

AMC1 CAMO.A.200(a)(2) Management system

SAFETY POLICY & OBJECTIVES

(a) The safety policy should:

(1) reflect organisational commitments regarding safety, and its proactive and systematic management, including the promotion of a positive safety culture;

(2) include internal reporting principles, and encourage personnel to report continuing airworthiness-related errors, incidents and hazards;

(3) recognise the need for all personnel to cooperate with the compliance monitoring and internal investigations referred to under point (c) of AMC1 CAMO.A.200(a)(3);

(4) be endorsed by the accountable manager;

(5) be communicated, with visible endorsement, throughout the organisation; and

(6) be periodically reviewed to ensure it remains relevant and appropriate for the organisation.

(b) The safety policy should include a commitment to:

(1) comply with all applicable legislation, to meet all the applicable requirements, and adopt practices to improve safety standard;

(2) provide the necessary resources for the implementation of the safety policy.

(3) apply HF principles;

(4) enforce safety as a primary responsibility of all managers; and

(5) 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 military aviation safety.

(c) Senior management should continually promote the safety policy to all personnel, demonstrate its commitment to it, and provide necessary human and financial resources for its implementation.

(d) Taking due account of its safety policy, the organisation should define safety objectives. The safety objectives should:

(1) form the basis for safety performance monitoring and measurement;

(2) reflect the organisation's commitment to maintain or continuously improve the overall effectiveness of the management system;

(3) be communicated throughout the organisation; and

(4) be periodically reviewed to ensure they remain relevant and appropriate for the organisation.

GM1 CAMO.A.200(a)(2) Management system

SAFETY POLICY

(a) The safety policy is the means whereby the organisation states its intention to maintain and, where practicable, improve safety levels in all its activities and to minimise its contribution to the risk of an aircraft accident or serious incident as far as is reasonably practicable. It reflects the management's commitment to safety, and should reflect the organisation's philosophy of safety management, as well as be the foundation on which the organisation's management system is built. It serves as a reminder of 'how we safely

work here'. The creation of a positive safety culture begins with the issuance of a clear, unequivocal policy.

(b) The commitment to apply 'just culture' principles forms the basis for the organisation's internal rules describing how 'just culture' principles are guaranteed and implemented.

(c) NOT APPLICABLE.

AMC1 CAMO.A.200(a)(3) Management system

SAFETY MANAGEMENT KEY PROCESSES

(a) Hazard identification processes

(1) A reporting scheme for both reactive event and proactive hazards should be the formal means of collecting, recording, analysing, acting on, and generating feedback about hazards and the associated risks that may affect safety.

(2) The identification should include:

(i) hazards that may be generated from HF issues that affect human performance; and

(ii) hazards that may stem from the organisational set-up or the existence of complex operational and maintenance arrangements (such as when multiple organisations are contracted, or when multiple levels of contracting/subcontracting are included).

(b) Risk management processes

(1) A formal safety risk management process should be developed and maintained that ensures that there is:
(i) analysis (e.g. in terms of the probability and severity of the consequences of hazards and occurrences);

(ii) assessment (in terms of tolerability); and

(iii) control (in terms of mitigation) of risks to an acceptable level.

(2) The levels of management who have the authority to make decisions regarding the tolerability of safety risks, in accordance with (b)(1)(ii), should be specified.

(c) Internal investigation

(1) In line with its just culture policy, the organisation should define how to investigate incidents such as errors or near misses, in order to understand not only what happened, but also how it happened, to prevent or reduce the probability and/or consequence of future recurrences (refer to AMC1 CAMO.A.202).

(2) The scope of internal investigations should extend beyond the scope of the occurrences required to be reported to the NMAA in accordance with EMAR CAMO.A.160, to include the reports referred to in EMAR CAMO.A.202(b).

(d) Safety performance monitoring and measurement

(1) Safety performance monitoring and measurement should be the process by which the safety performance of the organisation is verified in comparison with the safety policy and the safety objectives.

(2) This process may include, as appropriate to the size, nature and complexity of the organisation:

(i) safety reporting, addressing also the status of compliance with the applicable requirements;

(ii) safety reviews, including trends reviews, which would be conducted during the introduction of new products and their components, new equipment/technologies, the implementation of new or changed procedures, or in situations of organisational changes that may have an impact on safety;

(iii) safety audits focusing on the integrity of the organisation's management system, and on periodically assessing the status of safety risk controls; and

(iv) safety surveys, examining particular elements or procedures in a specific area, such as problem areas identified, or bottlenecks in daily continuing airworthiness management activities, perceptions and opinions of management personnel, and areas of dissent or confusion.

(e) Management of change

The organisation should manage the safety risks related to a change. The management of change should be a documented process to identify external and internal changes that may have an adverse effect on the safety of its continuing airworthiness management activities. It should make use of the organisation's existing hazard identification, risk assessment and mitigation processes.

(f) Continuous improvement

The organisation should continuously seek to improve its safety performance and the effectiveness of its management system. Continuous improvement may be achieved through:

(1) audits carried out by external organisations;

(2) assessments, including assessments of the effectiveness of the safety culture and management system, in particular to assess the effectiveness of the safety risk management processes;

(3) staff surveys, including cultural surveys, that can provide useful feedback on how engaged personnel are with the management system;

(4) monitoring the recurrence of incidents and occurrences;

(5) evaluation of safety performance indicators and review of all the available safety performance information; and

(6) identification of lessons learnt.

(g) Immediate safety action and coordination with the Operating Organisation

(1) A procedure should be implemented to enable the organisation to act promptly when it identifies safety concerns with the potential to have immediate effect on flight safety, including clear instructions on who to contact at the Operating Organisation, and how to contact them, including outside normal working hours. These provisions are without prejudice to the occurrence reporting required by EMAR CAMO.A.160.

(2) If applicable, a procedure should be implemented to enable the organisation to react promptly if triggered by the Operating Organisation and it requires the support of the CAMO.

GM1 CAMO.A.200(a)(3) Management system

SAFETY RISK MANAGEMENT — INTERFACES BETWEEN ORGANISATIONS

(a) Safety risk management processes should specifically address the planned implementation of, or participation of the organisation in, any complex operational and maintenance arrangements (such as when multiple organisations are contracted, or when multiple levels of contracting/subcontracting are included).

(b) Hazard identification and risk assessment start with an identification of all the parties involved in the arrangement, including independent experts and non-approved organisations. This 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:

(1) coordination and interfaces between the different parties;

(2) applicable procedures;

(3) communication between all the parties involved, including reporting and feedback channels;

(4) task allocation, responsibilities and authorities; and

(5) the qualifications and competency of key personnel with reference to EMAR CAMO.A.305.

(c) Safety risk management should focus on the following aspects:

(1) clear assignment of accountability and allocation of responsibilities;

(2) that only one party is responsible for a specific aspect of the arrangement, with no overlapping or conflicting responsibilities, in order to eliminate coordination errors;

(3) the existence of clear reporting lines, both for occurrence reporting and progress reporting;

(4) the possibility for staff to directly notify the organisation of any hazard that suggests an obviously unacceptable safety risk as a result of the potential consequences of this hazard.

(d) The safety risk management processes should ensure that there is regular communication between all the parties involved to discuss work progress, risk mitigation actions, and changes to the arrangement, as well as any other significant issues.

GM2 CAMO.A.200(a)(3) Management system

MANAGEMENT OF CHANGE

(a) Unless they are properly managed, changes in organisational structure, facilities, the scope of work, personnel, documentation, policies and procedures, etc. can result in the inadvertent introduction of new hazards, and expose the organisation to new or increased risk. Effective organisations seek to improve their processes, with conscious recognition that changes can expose the organisation to potentially latent hazards and risks if they are not properly and effectively managed.

(b) Regardless of the magnitude of change, large or small, its safety implications should always be proactively considered. This is primarily the responsibility of the team that proposes and/or implements the change. However, a change can only be successfully implemented if all the personnel affected by the change are engaged, are involved and

participate in the process. The magnitude of a change, its safety criticality, and its potential impact on human performance should be assessed in any change management process.

(c) The process for the management of change typically provides principles and a structured framework for managing all aspects of the change. Disciplined application of the management of change can maximise the effectiveness of the change, engage the staff, and minimise the risks that are inherent in a change.

(d) The introduction of a change is the trigger for the organisation to perform their hazard identification and risk management process.

Some examples of change include, but are not limited to:

(1) changes to the organisational structure;

(2) the inclusion of a new aircraft type in the terms of approval;

(3) the addition of aircraft of the same or a similar type;

(4) significant changes in personnel (affecting key personnel and/or large numbers of personnel, high turn-over);

(5) new or amended regulations;

(6) changes in the security arrangements;

(7) changes in the situation of an organisation (e.g. operational, commercial or financial pressure);

(8) new schedule(s), location(s), equipment, and/or operational procedures; and

(9) the addition of new subcontractors.

(e) A change may have the potential to introduce new, or to exacerbate pre-existing, HF issues. For example, changes in computer systems, equipment, technology, personnel changes, including changes in management personnel, procedures, work organisation, or work processes are likely to affect performance.

(f) The purpose of integrating HF into the management of change is to minimise potential risks by specifically considering the impact of the change on the people within a system.

(g) Special consideration, including any HF issues, should be given to the ‘transition period’. In addition, the activities utilised to manage these issues should be integrated into the change management plan.

(h) Effective management of change should be supported by the following:

(1) Implementation of a process for formal hazard identification/risk assessment for major operational changes, major organisational changes, changes in key personnel, and changes that may affect the way continuing airworthiness management is carried out.

(2) Identification of changes that are likely to occur in the activity which would have a noticeable impact on:

(i) resources — material and human;

(ii) management direction — policies, processes, procedures, training; and

(iii) management control.

(3) Safety cases/risk assessments that are military aviation-safety focused.

(4) Involvement of key stakeholders in the change management process as appropriate.

(i) During the management of change process, previous risk assessments, and existing hazards are reviewed for possible effect.

AMC1 CAMO.A.200(a)(4) Management system

COMMUNICATION ON SAFETY

(a) The organisation should establish communication about safety matters that:

(1) ensures that all personnel are aware of the safety management activities, as appropriate, for their safety responsibilities;

(2) conveys safety-critical information, especially related to assessed risks and analysed hazards;

(3) explains why particular actions are taken; and

(4) explains why safety procedures are introduced or changed.

(b) Regular meetings with personnel at which information, actions, and procedures are discussed, may be used to communicate safety matters.

GM1 CAMO.A.200(a)(4) Management system

SAFETY PROMOTION

(a) Safety training, combined with safety communication and information sharing, forms part of safety promotion.

(b) Safety promotion activities support:

(1) the organisation's policies, encouraging a positive safety culture, creating an environment that is favourable to the achievement of the organisation's safety objectives;

(2) organisational learning; and

(3) the implementation of an effective safety reporting scheme and the development of a just culture.

(c) Depending on the particular safety issue, safety promotion may also constitute or complement risk mitigation actions.

(d) Qualification and training aspects are further specified in the AMC and GM to EMAR CAMO.A.305.

GM1 CAMO.A.200(a)(5) Management system

MANAGEMENT SYSTEM DOCUMENTATION

(a) The organisation may document its safety policy, safety objectives and all its key management system processes in a separate manual (e.g. Safety Management Manual or management System Manual) or in its CAME (cf. AMC1 CAMO.A.300, Part 2 'Management system procedures'). Organisations that hold multiple organisation certificates within the scope of EMARs may prefer to use a separate manual in order to avoid duplication.

That manual or the CAME, depending on the case, should be the key instrument for communicating the approach to the management system for the whole of the organisation.

(b) The organisation may also choose to document some of the information that is required to be documented in separate documents (e.g. policy documents, procedures). In that case, it should ensure that the manual or the CAME contains adequate references to any document that is kept separately. Any such documents are to be considered as integral parts of the organisation's management system documentation.

AMC1 CAMO.A.200(a)(6) Management system

COMPLIANCE MONITORING — GENERAL

(a) The primary objectives of compliance monitoring are to provide an independent monitoring function on how the organisation ensures compliance with the applicable requirements, policies and procedures, and to request action where non-compliances are identified.

(b) The independence of the compliance monitoring should be established by always ensuring that audits and inspections are carried out by personnel who are not responsible for the functions, procedures or products that are audited or inspected.

AMC2 CAMO.A.200(a)(6) Management System

COMPLIANCE MONITORING — INDEPENDENT AUDIT

(a) An essential element of compliance monitoring is the independent audit.

(b) The independent audit should be an objective process of routine sample checks of all aspects of the organisation ability to carry out continuing airworthiness management to the standards required by continuing airworthiness EMARs. It should include some product sampling as this is the end result of the process.

(c) The independent audit should provide an objective overview of the complete set of continuing airworthiness management-related activities.

(d) The organisation should establish an audit plan to show when and how often the activities as required by EMAR M and EMAR CAMO will be audited.

(e) The audit plan should ensure that all aspects of EMAR CAMO compliance are verified every year, including all the subcontracted activities, and the auditing may be carried out as a complete single exercise or subdivided over the annual period. The independent audit should not require each procedure to be verified against each product line when it can be shown that the particular procedure is common to more than one product line and the procedure has been verified every year without resultant findings. Where findings have been identified, the particular procedure should be verified against other product lines until the findings have been closed, after which the independent audit procedure may revert to a yearly interval for the particular procedure.

(f) Provided that there are no safety-related findings, the audit planning cycle specified in this AMC may be increased by up to 100 %, subject to a risk assessment and/or mitigation actions, and agreement by the NMAA.

(g) Where the organisation has more than one location approved, the audit plan should ensure that each location is audited every year or at an interval determined through a risk assessment agreed by the NMAA and not exceeding the applicable audit planning cycle.

(h) A report should be issued each time an audit is carried out describing what was checked and the resulting non-compliance findings against applicable requirements and procedures.

AMC3 CAMO.A.200(a)(6) Management system

COMPLIANCE MONITORING — CONTRACTING OF THE INDEPENDENT AUDIT

(a) If external personnel are used to perform independent audits:

(1) any such audits are performed under the responsibility of the compliance monitoring manager; and

(2) the organisation remains responsible for ensuring that the external personnel have the relevant knowledge, background, and experience that are appropriate to the activities being audited, including knowledge and experience in compliance monitoring.

(b) The organisation retains the ultimate responsibility for the effectiveness of the compliance monitoring function, in particular for the effective implementation and follow-up of all corrective actions.

AMC4 CAMO.A.200(a)(6) Management system

COMPLIANCE MONITORING — FEEDBACK SYSTEM

(a) An essential element of the compliance monitoring is the feedback system.

(b) The feedback system should not be contracted to external persons or organisations.

(c) When a non-compliance is found, the compliance monitoring function should ensure that the root cause(s) and contributing factor(s) are identified (see GM1 CAMO.A.150), and that corrective actions are defined. The feedback part of the compliance monitoring function should define who is required to address any non-compliance in each particular case, and the procedure to be followed if the corrective action is not completed within the defined time frame. The principal functions of the feedback system are to ensure that all findings resulting from the independent audits of the organisation are properly investigated and corrected in a timely manner, and to enable the accountable manager to be kept informed of any safety issues and the extent of compliance with EMAR CAMO.

(d) The independent audit reports referred to in AMC2 CAMO.A.200(a)(6) should be sent to the relevant service(s) for corrective action, giving target closure dates. These target dates should be discussed with the relevant service(s) before the compliance monitoring function confirms the dates in the report. The relevant service(s) are required to implement the corrective action and inform the compliance monitoring function of the status of the implementation of the action.

(e) Unless the review of the results from compliance monitoring is the responsibility of the safety review board (ref. AMC1 CAMO.A.200(a)(1) point (b)(4)), the accountable manager should hold regular meetings with staff to check the progress of any corrective actions. These meetings may be delegated to the compliance monitoring manager on a day-to-day basis, provided that the accountable manager:

(1) meets the senior staff involved at least twice per year to review the overall performance of the compliance monitoring function; and

(2) receives at least a half-yearly summary report on non-compliance findings.

(f) All records pertaining to the independent audit and the feedback system should be retained or the period specified in EMAR CAMO.A.220(b) or for such periods as to support changes to the audit planning cycle in accordance with AMC2 CAMO.A.200(a)(6), whichever is the longer.

GM1 CAMO.A.200(a)(6) Management system

COMPLIANCE MONITORING FUNCTION

The compliance monitoring function is one of the elements that is required to be in compliance with the applicable requirements. This means that the compliance monitoring function itself should be subject to independent monitoring of compliance in accordance with EMAR CAMO.A.200(a)(6).

GM1 CAMO.A.200(a)(6) and CAMO.B.300 Management system and Oversight principles

THE USE OF INFORMATION AND COMMUNICATION TECHNOLOGIES (ICT) FOR PERFORMING REMOTE AUDITS

This GM provides technical guidance on the use of remote information and communication technologies (ICT) to support:

− NMAAs when overseeing regulated organisations;

− regulated organisations when conducting internal audits / monitoring compliance of their organisation with the relevant requirements, and when evaluating suppliers and subcontractors.

In the context of this GM:

− ‘remote audit’ means an audit that is performed with the use of any real-time video and audio communication tools instead of the physical presence of the auditor on-site; the specificities of each type of approval need to be considered in addition to the general overview (described below) when applying the ‘remote audit’ concept;

− ‘auditing entity’ means the NMAA or organisation that performs the remote audit;

− ‘auditee’ means the entity being audited/inspected (or the entity audited/inspected by the auditing entity via a remote audit);

It is the responsibility of the auditing entity to assess whether the use of remote ICT constitutes a suitable alternative to the physical presence of an auditor on-site in accordance with the applicable requirements.

The conduct of a remote audit

The auditing entity that decides to conduct a remote audit should describe the remote audit process in its documented procedures and should consider at least the following elements:

− The methodology for the use of remote ICT is sufficiently flexible and non-prescriptive in nature to optimise the conventional audit process.

− Adequate controls are defined and are in place to avoid abuses that could compromise the integrity of the audit process.

− Measures to ensure that the security and confidentiality are maintained throughout the audit activities (data protection and intellectual property of the organisation also need to be safeguarded).

Examples of the use of remote ICT during audits may include but are not limited to:

− meetings by means of teleconference facilities, including audio, video and data sharing;

− assessment of documents and records by means of remote access, in real time;

− recording, in real time during the process, of evidence to document the results of the audit, including non-conformities, by means of exchange of emails or documents, instant pictures, video or/and audio recordings;

− visual (livestream video) and audio access to facilities, stores, equipment, tools, processes, operations, etc.

An agreement between the auditing entity and the auditee should be established when planning a remote audit, which should include the following:

− determining the platform for hosting the audit;

− granting security and/or profile access to the auditor(s);

− testing platform compatibility between the auditing entity and the auditee prior to the audit;

− considering the use of webcams, cameras, drones, etc. when the physical evaluation of an event (product, part, process, etc.) is desired or is necessary;

− establishing an audit plan which will identify how remote ICT will be used and the extent of their use for the audit purposes to optimise their effectiveness and efficiency while maintaining the integrity of the audit process;

− if necessary, time zone acknowledgement and management to coordinate reasonable and mutually agreeable convening times;

− a documented statement of the auditee that they shall ensure full cooperation and provision of the actual and valid data as requested, including ensuring any supplier or subcontractor cooperation, if needed; and

− data protection aspects.

The following equipment and set-up elements should be considered:

− the suitability of video resolution, fidelity, and field of view for the verification being conducted

− the need for multiple cameras, imaging systems, or microphones, and whether the person that performs the verification can switch between them, or direct them to be switched and has the possibility to stop the process, ask a question, move the equipment, etc.;

− the controllability of viewing direction, zoom, and lighting;

− the appropriateness of audio fidelity for the evaluation being conducted; and

− real-time and uninterrupted communication between the person(s) participating to the remote audit from both locations (on-site and remotely).

When using remote ICT, the auditing entity and the other persons involved (e.g. drone pilots, technical experts) should have the competence and ability to understand and utilise the remote ICT tools employed to achieve the desired results of the audit(s)/assessment(s). The auditing

entity should also be aware of the risks and opportunities of the remote ICT used and the impacts they may have on the validity and objectivity of the information gathered.

Audit reports and related records should indicate the extent to which remote ICT have been used in conducting remote audits and the effectiveness of remote ICT in achieving the audit objectives, including any item that has not been able to be completely reviewed.

AMC1 CAMO.A.202 Internal safety reporting scheme

GENERAL

(a) Each internal safety reporting scheme should be confidential and enable and encourage free and frank reporting of any potentially safety-related occurrence, including incidents such as errors or near misses, safety issues and hazards identified. This will be facilitated by the establishment of a just culture.

(b) The internal safety reporting scheme should contain the following elements:

(1) clearly identified aims and objectives with demonstrable corporate commitment;

(2) a just culture policy as part of the safety policy, and related just culture implementation procedures;

(3) a process to:

(i) identify those reports which require further investigation; and

(ii) when so identified, investigate all the causal and contributing factors, including any technical, organisational, managerial, or HF issues, and any other contributing factors related to the occurrence, incident, error or near miss that was identified;

(iii) if adapted to the size and complexity of the organisation, analyse the collective data showing the trends and frequencies of the contributing factor;

(4) appropriate corrective actions based on the findings of investigations;

(5) initial and recurrent training for staff involved in internal investigations;

(6) where relevant, the organisation should cooperate with the Operating Organisation on occurrence investigations by exchanging relevant information to improve military aviation safety.

(c) The internal safety reporting scheme should:

(1) ensure confidentiality to the reporter;

(2) be closed-loop, to ensure that actions are taken internally to address any safety issues and hazards; and

(3) feed into the recurrent training as defined in AMC2 CAMO.A.305(g) whilst maintaining appropriate confidentiality.

(d) Feedback should be given to staff both on an individual and a more general basis to ensure their continued support of the safety reporting scheme.

GM1 CAMO.A.202 Internal safety reporting scheme

GENERAL

(a) The overall purpose of the internal safety reporting scheme is to collect information reported by the organisation personnel and use this reported information to improve the level of compliance and safety performance of the organisation. The purpose is not to attribute blame.

(b) The objectives of the scheme are to:

(1) enable an assessment to be made of the safety implications of each relevant incident (errors, near miss), safety issue and hazard reported, including previous similar issues, so that any necessary action can be initiated; and

(2) ensure that knowledge of relevant incidents, safety issues and hazards is shared so that other persons and organisations may learn from them.

(c) The scheme is an essential part of the overall monitoring function and should be complementary to the normal day-to-day procedures and 'control' systems; it is not intended to duplicate or supersede any of them. The scheme is a tool to identify those instances in which routine procedures have failed or may fail.

(d) All reports should be retained, as the significance of such reports may only become obvious at a later date.

(e) The collection and analysis of timely, appropriate and accurate data will allow the organisation to react to information that it receives and apply the necessary action.

GM1 CAMO.A.205 Contracting and subcontracting

RESPONSIBILITY WHEN CONTRACTING MAINTENANCE AND/OR AIRWORTHINESS REVIEW OR SUBCONTRACTING CONTINUING AIRWORTHINESS MANAGEMENT TASKS

(a) Regardless of the approval status of the subcontracted organisations, the CAMO is responsible for ensuring that all subcontracted activities are subject to hazard identification and risk management, as required by EMAR CAMO.A.200(a)(3), and to compliance monitoring, as required by EMAR CAMO.A.200(a)(6).

(b) A CAMO is responsible for identifying hazards that may stem from the existence of complex arrangements (such as when multiple maintenance organisations are contracted, or when multiple levels of contracting/subcontracting are included) with due regard to the organisations' interfaces (see GM1 CAMO.A.200(a)(3)). In addition, the compliance monitoring function should at least check that the approval of the contracted organisation(s) effectively covers the contracted activities, and that it is still valid.

(c) A CAMO is responsible for ensuring that interfaces and communication channels are established with the contracted organisation for occurrence reporting. This does not replace the obligation of the contracted organisation to report to the NMAA in accordance with continuing airworthiness EMARs.

For subcontracted activities, interfaces and communication channels are also needed for the purpose of the internal safety reporting scheme (EMAR CAMO.A.202).

AMC1 CAMO.A.215 Facilities

GENERAL

Office accommodation should be such that the incumbents, whether they are continuing airworthiness management, planning, technical records or management system staff, can carry out their designated tasks in a manner that contributes to good standards. The NMAA may agree to these tasks being conducted from one office subject to being satisfied that there is sufficient space and that each task can be carried out without undue disturbance. Office accommodation should also include an adequate technical library and room for document consultation.

AMC1 CAMO.A.220 Record-keeping

GENERAL

(a) The record-keeping system should ensure that all records are accessible within a reasonable time whenever they are needed. These records should be organised in a manner that ensures their traceability and retrievability throughout the required retention period.

(b) Records should be kept in paper form, or in electronic format, or a combination of the two. Records that are stored on microfilm or in optical disc formats are also acceptable. The records should remain legible throughout the required retention period. The retention period starts when the record is created or was last amended.

(c) Paper systems should use robust materials which can withstand normal handling and filing. Computer record systems should have at least one backup system, which should be updated within 24 hours of any new entry. Computer record systems should include safeguards to prevent unauthorised personnel from altering the data.

(d) All computer hardware that is used to ensure the backup of data should be stored in a different location from the one that contains the working data, and in an environment that ensures that the data remains in good condition. When hardware or software changes take place, special care should be taken to ensure that all the necessary data continues to be accessible through at least the full period specified in the relevant provision. In the absence of any such indications, all records should be kept for a minimum period of 3 years.

AMC2 CAMO.A.220 Record-keeping

CONTINUING AIRWORTHINESS MANAGEMENT RECORDS

(a) The CAMO should ensure that it always receives a complete Certificate of Release to Service from the approved maintenance organisation such that the required records can be retained.

The system to keep the continuing airworthiness records should be described in the CAME.

(b) When a CAMO arranges for the relevant maintenance organisation to retain copies of the continuing airworthiness records on its behalf, it will nevertheless continue to be responsible for the records under EMAR CAMO.A.220 relating to the preservation of records. If it ceases to be the CAMO of the aircraft, it also remains responsible for transferring the records to any other organisation managing continuing airworthiness of the aircraft.

GM1 CAMO.A.220 Record-keeping

RECORDS

Microfilming or optical storage of records may be carried out at any time. The records should be as legible as the original record, and remain so for the required retention period.

AMC1 CAMO.A.220(c)(1)(ii) Record-keeping

RECORDS OF AIRWORTHINESS REVIEW STAFF

The following minimum information, as applicable, should be kept on record in respect of each ARS:

- Name;
- Date of birth;
- Basic education;
- Experience;
- Aeronautical degree and/or EMAR 66 qualification and/or nationally-recognised maintenance personnel qualification;
- Initial training received;
- Type of training received;
- Recurrent training received;
- Experience in continuing airworthiness and within the organisation;
- Responsibilities of current role in the organisation;
- Copy of the authorisation.

AMC1 CAMO.A.300 Continuing airworthiness management exposition (CAME)

This AMC provides an outline of the layout of an acceptable CAME. Where an organisation uses a different format, for example, to allow the exposition to serve for more than one approval within the scope of EMARs, then the exposition should contain a cross-reference Annex using this list as an index with an explanation as to where the subject matter can be found in the exposition.

The information required by EMAR CAMO.A.300 should be provided, directly or by reference, in the CAME.

Part 0 General organisation, safety policy and objectives

0.1 Safety policy, objectives and accountable manager statement

0.2 General information and scope of work

0.3 Management personnel

0.4 Management organisation chart

0.5 Procedure for changes requiring prior approval

0.6 Procedure for changes not requiring prior approval

0.7 Procedure for alternative means of compliance (AltMoC)

Part 1 Continuing airworthiness management procedures

1.1a Use of aircraft continuing airworthiness record system and if applicable, Aircraft Technical Log (ATL) system

1.1b MEL application

1.2 Aircraft Maintenance Programme (AMP) — development amendment and approval

1.3 Continuing airworthiness records: responsibilities, retention and access

1.4 Accomplishment and control of Airworthiness Directives

1.5 Analysis of the effectiveness of the AMP(s)

1.6 Non-mandatory modification and inspections

1.7 Repairs and modifications

1.8 Defect reports

1.9 Engineering activity

1.10 Reliability programmes

1.11 Pre-flight inspections

1.12 Aircraft weighing

1.13 Maintenance check flight procedures

Part 2 Management system procedures

2.1 Hazard identification and safety risk management schemes

2.2 Internal safety reporting and investigations

2.3 Safety action planning

2.4 Safety performance monitoring

2.5 Change management

2.6 Safety training and promotion

2.7 Immediate safety action and coordination with Operating Organisation

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 AMP(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

Part 3 Contracted maintenance — management of maintenance

3.1 Maintenance contractor selection procedure

3.2 Product audit of aircraft

Part 4 Airworthiness review procedures

4.1 Airworthiness Review Staff (ARS)

4.2 Documented review of aircraft records

4.3 Physical survey

4.4 TO BE ADDED LATER IF REQUIRED.

4.5 MARC recommendations to NMAAs

4.6 Issue of MARC

4.7 Airworthiness review records, responsibilities, retention and access

4.8 MARC extension

Part 4B Military Permit to fly procedures

4B.1 Conformity with approved flight conditions

4B.2 Issue of the Military Permit to Fly under the CAMO privilege

4B.3 Military Permit to Fly authorised signatories

4B.4 Interface with the local authority for the flight

4B.5 Military Permit to Fly records, responsibilities, retention and access

Part 5 Supporting documents

5.1 Sample documents, including the template of the ATL system

5.2 List of Airworthiness Review Staff (ARS)

5.3 List of subcontractors as per EMAR CAMO.A.125(d)(3)

5.4 List of contracted maintenance organisations and list of maintenance contracts as per EMAR CAMO.A.300(a)(13)

5.5 Copy of contracts for subcontracted work (Appendix II to AMC1 CAMO.A.125(d)(3))

5.6 List of approved AMP as per EMAR CAMO.A.300(a)(12)

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

AMC2 CAMO.A.300 Continuing airworthiness management exposition (CAME)

(a) Personnel should be familiar with those parts of the CAME that are relevant to their tasks.

(b) The CAMO should designate the person responsible for monitoring and amending the CAME, including associated procedure's manuals, in accordance with EMAR CAMO.A.300(c).

(c) The CAMO may use electronic data processing (EDP) for the publication of the CAME. Attention should be paid to the compatibility of the EDP systems with the necessary dissemination, both internally and externally, of the CAME.

GM1 CAMO.A.300 Continuing airworthiness management exposition (CAME)

The purpose of the CAME is to:

− specify the scope of work and show how the organisation intends to comply with EMAR CAMO and EMAR M; and

− provide all the necessary information and procedures for the personnel of the organisation to perform their duties.

Complying with its contents will ensure the organisation remains in compliance with EMAR CAMO and EMAR M.

AMC1 CAMO.A.300(a)(1) Continuing airworthiness management exposition (CAME)

ACCOUNTABLE MANAGER STATEMENT

1. Part 0 ‘General organisation, safety policy and objectives’ of the CAME should include a statement, signed by the accountable manager (and countersigned by the chief executive officer or senior military commander, if different), confirming that the CAME and any associated manuals will be complied with at all times.

2. The accountable manager’s exposition statement as specified in EMAR CAMO.A.300(a)(1) should embrace the intent of the following paragraph, and in fact, this statement may be used without amendment. Any amendment to the statement should not alter its intent:

‘This exposition and any associated referenced manuals define the organisation and procedures upon which the NMAA’s* CAMO approval is based.

These procedures are endorsed by the undersigned and must be complied with, as applicable, in order to ensure that all continuing airworthiness activities, including maintenance of the aircraft managed, are carried out on time to an approved standard.

These procedures do not override the necessity of complying with any new or amended regulation published from time to time where these new or amended regulations are in conflict with these procedures.

It is understood that the approval of the organisation is based on the continuous compliance of the organisation with EMAR CAMO and EMAR M and with the organisation’s procedures described in this exposition. The NMAA* is entitled to limit, suspend, or revoke the approval certificate if the organisation fails to fulfil the obligations imposed by EMAR CAMO and EMAR M or any conditions according to which the approval was issued.

Signed .....

Dated .....

Accountable manager and ... (quote position) ...

Chief Executive Officer or senior military commander…

For and on behalf of ... (quote organisation’s name) ... ’

*Where ‘NMAA’ is stated, please insert the actual name of the NMAA delivering the CAMO approval certificate or the air operator certificate.

3. Whenever the accountable manager is changed, it is important to ensure that the new accountable manager signs the paragraph 2 statement at the earliest opportunity.

AMC1 CAMO.A.305(a) Personnel requirements

ACCOUNTABLE MANAGER

Accountable manager is normally intended to mean the chief executive officer or the senior military commander of the CAMO, who by virtue of his or her position, has overall (including in particular resource allocation) responsibility for running the organisation. The accountable manager may be the accountable manager for more than one organisation, and is not necessarily required to be knowledgeable on technical matters, as the CAME defines the continuing airworthiness standards. When the accountable manager is neither the chief executive officer nor the senior military commander, the organisation should demonstrate to the NMAA that the accountable manager has direct access to the chief executive officer or senior military commander and has a sufficiency of 'continuing airworthiness resources' allocation.

AMC1 CAMO.A.305(a)(3) Personnel requirements

MANAGEMENT STRUCTURE FOR CONTINUING AIRWORTHINESS MANAGEMENT

The person or group of persons nominated under EMAR CAMO.A.305(a)(3) with the responsibility for ensuring compliance should represent the management structure of the organisation, and be responsible for the daily operation of the organisation, for all continuing airworthiness management functions.

Dependent on the size of the operation and the organisational set-up, the continuing airworthiness management functions may be divided under individual managers or combined in any number of ways.

GM1 CAMO.A.305(a)(3) Personnel requirements

RESPONSIBILITY FOR ENSURING COMPLIANCE

The person(s) nominated in accordance with EMAR CAMO.A.305(a)(3) are responsible, in the day-to-day continuing airworthiness management activities, for ensuring that the organisation personnel work in accordance with the applicable procedures and regulatory requirements.

These nominated persons should demonstrate a complete understanding of the applicable regulatory requirements, and ensure that the organisation's processes and standards accurately reflect the applicable requirements. It is their role to ensure that compliance is proactively managed, and that any early warning signs of non-compliance are documented and acted upon.

AMC1 CAMO.A.305(a)(4);(a)(5) Personnel requirements

SAFETY MANAGEMENT AND COMPLIANCE MONITORING FUNCTION

(a) Safety management

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'.

The functions of the safety manager should be to:

(i) facilitate hazard identification, risk assessment and management;

(ii) monitor the implementation of actions taken to mitigate risks, as listed in the safety action plan, unless action follow-up is addressed by the compliance monitoring function;

(iii) provide periodic reports on safety performance to the safety review board (the functions of the safety review board are those defined in AMC1 CAMO.A.200(a)(1));

(iv) ensure the maintenance of safety management documentation;

(v) ensure that there is safety training available, and that it meets acceptable standards;

(vi) provide advice on safety matters; and

(vii) ensure the initiation and follow-up of internal occurrence investigations.

(b) Compliance monitoring function

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'.

(1) The role of the compliance monitoring manager should be to ensure that:

(i) the activities of the organisation are monitored for compliance with the applicable requirements and any additional requirements as established by the organisation, and that these activities are carried out properly under the supervision of the nominated persons referred to in EMAR CAMO.A.305(a)(3) to (a)(5).

(ii) any contracted maintenance is monitored for compliance with the contract or work order;

(iii) an audit plan is properly implemented, maintained, and continually reviewed and improved; and

(iv) corrections and corrective actions are requested as necessary.

(2) The compliance monitoring manager should:

(i) not be one of the persons referred to in EMAR CAMO.A.305(a)(3);

(ii) be able to demonstrate relevant knowledge, background and appropriate experience related to the activities of the organisation, including knowledge and experience in compliance monitoring; and

(iii) have access to all parts of the organisation, and as necessary, any subcontracted organisation.

(c) If the functions related to compliance monitoring or safety management are combined with other duties, the organisation should ensure this does not result in any conflicts of interest. In particular, the compliance monitoring function should be independent from the continuing airworthiness management functions.

(d) If the same person is designated to manage both the compliance monitoring function and safety management-related processes and tasks, the accountable manager, with regard to his or her direct accountability for safety, should ensure that sufficient resources are allocated to both functions, taking into account the size of the organisation, and the nature and complexity of its activities.

(e) Subject to a risk assessment and/or mitigation actions, and agreement by the NMAA, with due regard to the size of the organisation and the nature and complexity of its activities, the compliance monitoring manager role and/or safety manager role may be exercised by the accountable manager, provided that he or she has demonstrated the related competency as defined in point (b)(2)(ii).

GM1 CAMO.A.305(a)(5) Personnel requirements

SAFETY MANAGER

(a) Depending on the size of the organisation and the nature and complexity of its activities, the safety manager may be assisted by additional safety personnel in performing all the safety management tasks as defined in AMC1 CAMO.A.200(a)(1).

(b) Regardless of the organisational set-up, it is important that the safety manager remains the unique focal point for the development, administration, and maintenance of the organisation's safety management processes.

AMC1 CAMO.A.305(b)(2) Personnel requirements

POST HOLDER(S)

(a) When the Operating Organisation intends to nominate a CAMO post holder who is also employed by an EMAR 145 organisation, it should justify why such nomination is being made and support it through a risk assessment and/or mitigation actions.

(b) This paragraph only applies to contracted maintenance and therefore does not affect situations where the organisation approved under EMAR 145 and the Operating Organisation are the same organisation.

AMC1 CAMO.A.305(c) Personnel requirements

KNOWLEDGE, BACKGROUND AND EXPERIENCE OF NOMINATED PERSON(S)

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

(a) practical experience and expertise in the application of aviation safety standards and safe operating practices;

(b) a comprehensive knowledge of:

  (i) relevant parts of operational requirements and procedures;

  (ii) NOT APPLICABLE;

  (iii) NOT APPLICABLE.

(c) knowledge of:

  (i) HF principles;

  (ii) safety management systems based on the principles detailed in Appendix I to Annexes B and C – Policy on Safety Management System (SMS) of BFD as well as compliance monitoring.

(d) 5 years of relevant work experience, of which at least 2 years should be from the aeronautical environment in an appropriate position;

(e) a relevant engineering degree or an aircraft maintenance technician qualification with additional education that is acceptable to the NMAA. For the Safety Manager (EMAR CAMO.A.305(a)5) other qualifications may be accepted by the NMAA.

'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.

(f) thorough knowledge of the organisation's CAME;

(g) knowledge of a relevant sample of the type(s) of aircraft gained through a formalised training course. These courses should be at least at a level equivalent to EMAR 66 Appendix III Level 1 (General Familiarisation) and could be provided by an EMAR 147 organisation, by the manufacturer, or by any other organisation accepted by the NMAA.

'Relevant sample' means that these courses should cover typical aircraft and aircraft systems that are within the scope of work.

(h) knowledge of maintenance methods;

(i) knowledge of the applicable regulations.

For the presentation to the NMAA of the knowledge, background and experience of the nominated personnel the organisation may consider using the EMAR Form 4 that is contained in the EMAR Forms document.

AMC1 CAMO.A.305(d) Personnel requirements

SUFFICIENT NUMBER OF PERSONNEL

(a) The actual number of persons to be employed and their necessary qualifications is dependent upon the tasks to be performed and thus dependent on the size, nature and complexity of the organisation (number of aircraft and the aircraft types, complexity of the aircraft and their age, ETOPS) and the amount and complexity of maintenance contracting.

Consequently, the number of persons needed, and their qualifications may differ greatly from one organisation to another and a simple formula covering the whole range of possibilities is not feasible.

(b) To implement a system to plan the availability of staff and to enable the NMAA to accept the number of persons and their qualifications, the organisation should make an analysis of the tasks to be performed, the way in which it intends to divide and/or combine these tasks, indicate how it intends to assign responsibilities and establish the number of man/hours and the qualifications needed to perform the tasks. This analysis should be kept up to date and reviewed in case of significant changes to the organisation.

(c) In addition, as part of its management system in accordance with EMAR CAMO.A.200, the organisation should have a procedure to assess and mitigate risks:

(1) when actual staff availability is less than the planned staffing level for any particular work shift or period;

(2) in case of a temporary increase of the proportion of contracted staff for the purpose of meeting specific operational needs.

GM1 CAMO.A.305(f) Personnel requirements

PERSONS AUTHORISED TO EXTEND MILITARY AIRWORTHINESS REVIEW CERTIFICATES

The approval by the NMAA of the exposition, containing, as specified in EMAR CAMO.A.300(a)(5), the list of EMAR CAMO.A.305(f) personnel authorised to extend MARC, constitutes their formal acceptance by the NMAA and also their formal authorisation by the organisation.

ARS are automatically recognised as persons with authority to extend a MARC in accordance with EMAR CAMO.A.125(e)(1) and EMAR M.A.901(f).

AMC1 CAMO.A.305(g) Personnel requirements

COMPETENCY ASSESSMENT OBJECTIVES

The procedure referred to in EMAR CAMO.A.305(g) should require amongst others that technical support personnel such as, planners, engineers, and technical record staff, supervisors, post-holders, ARS, whether employed or contracted, are assessed for competency before unsupervised work commences and competency is controlled on a continuous basis.

Competency should be assessed by the evaluation of:

− on-the-job performance and/or testing of knowledge by appropriately qualified personnel;

− records for basic, organisational, and/or product type and differences training; and

− experience records.

Validation of the above could include a confirmation check with the organisation(s) that issued such document(s). For that purpose, experience/training may be recorded in a document such as a log book.

As a result of this assessment, an individual’s qualification should determine:

− which level of ongoing supervision would be required and whether unsupervised work could be permitted;

− whether there is a need for additional training.

A record should be kept of each individual’s qualifications and competency assessment (refer also to EMAR CAMO.A.220(c)). This should include copies of all documents that attest to their qualifications, such as an authorisation held, as applicable.

For a proper competency assessment of its personnel, the organisation should consider the following:

(a) In accordance with the job function, adequate initial and recurrent training should be provided and recorded to ensure continued competency so that it is maintained throughout the duration of the employment/contract.

(b) All staff should be able to demonstrate knowledge of, and compliance with, the CAMO procedures, as applicable to their duties.

(c) All staff should be able to demonstrate an understanding of safety management principles including HF, related to their job function and be trained as per AMC3 CAMO.A.305(g).

(d) To assist in the assessment of competency and to establish the training needs analysis, job descriptions are recommended for each job function in the organisation. Job descriptions should contain sufficient criteria to enable the required competency assessment.

(e) Criteria should allow the assessment to establish that, among other aspects (titles might be different in each organisation):

(1) Managers are able to properly manage processes, resources and priorities described in their assigned duties, accountabilities and responsibilities in accordance with the safety policy and objectives and in compliance with the applicable requirements and procedures.

(2) Maintenance programme engineers are able to interpret source data (norms, data issued by the holder of a design approval or by the NMAA, etc.) and use them to develop the AMP.

(3) Engineering staff are able to interpret source data (norms, data issued by the holder of a design approval or by the NMAA, etc.) and use them as needed (e.g. to make work cards).

(4) Planners are able to organise maintenance activities in an effective and timely manner.

(5) Compliance monitoring staff are able to monitor compliance with continuing airworthiness EMARs and to identify non-compliances in an effective and timely manner so that the organisation may remain in compliance with continuing airworthiness EMARs.

(6) Staff who have been designated safety management responsibilities are familiar with the relevant processes in terms of hazard identification, risk management, and the monitoring of safety performance.

(7) All staff are familiar with the safety policy and the procedures and tools that can be used for internal safety reporting.

(f) The competency assessment should be based upon the procedure specified in AMC2 CAMO.A.305(g).

AMC2 CAMO.A.305(g) Personnel requirements

COMPETENCY ASSESSMENT PROCEDURE

(a) The organisation should develop a procedure that describes the process for conducting competency assessment of personnel. The procedure should specify:

(1) the persons who are responsible for this process;

(2) when the assessment should take place;

(3) how to give credit from previous assessments;

(4) how to validate qualification records;

(5) the means and methods to be used for the initial assessment;

(6) the means and methods to be used for the continuous control of competency, including to gather feedback on the performance of personnel;

(7) the aspects of competencies to be observed during the assessment in relation to each job function;

(8) the actions to be taken if the assessment is not satisfactory; and

(9) how to record assessment results.

(b) Competency may be assessed by having the person work under the supervision of another qualified person for a sufficient time to arrive at a conclusion. Sufficient time could be as little as a few weeks if the person is fully exposed to relevant work. The person need not be assessed against the complete spectrum of their intended duties. If the person has been recruited from another approved CAMO, it is reasonable to accept a written confirmation from the previous organisation.

(c) All prospective continuing airworthiness management staff should be assessed for their competency related to their intended duties.

AMC3 CAMO.A.305(g) Personnel requirements

SAFETY TRAINING (INCLUDING HUMAN FACTORS)

(a) With respect to the understanding of the application of safety management principles (including HF), all organisation personnel should be assessed for the need to receive initial safety training.

Personnel involved in the delivery of the continuing airworthiness management services of the organisation should receive both initial and recurrent safety training, appropriate for their responsibilities.

This should include at least the following staff members:

− nominated persons, line managers;

− persons involved in any compliance monitoring and/or safety management related processes and tasks, including application of HF principles, internal investigations and safety training;

− ARS;

− technical support personnel such as, planners, engineers, and technical record staff;

− personnel involved in developing and amending/reviewing the AMP, in assessing its effectiveness and/or working on reliability programme; and

− contract staff in the above categories.

The generic term ‘line managers’ refers to departmental head or person responsible for operational departments or functional units directly involved in the delivery of the continuing airworthiness management services of the organisation.

(b) Initial safety training should cover all the topics of the training syllabus specified in GM2 CAMO.A.305(g) either as a dedicated course or else integrated within other training. The syllabus may be adjusted to reflect the particular nature of the organisation. The syllabus may also be adjusted to suit the particular nature of work for each function within the organisation.

Initial safety training compliant with the organisation's training standards should be provided to personnel identified in accordance with point (a) of this AMC within 6 months of joining the organisation, but temporary staff may need to be trained shortly after joining the organisation to cope with the duration of employment. Personnel being recruited from another organisation, and temporary staff should be assessed for the need to receive any additional safety training.

(c) The purpose of recurrent safety training is primarily to ensure that staff remain current in terms of SMS principles and HF, and also to collect feedback on safety and HF issues.

Consideration should be given to involving compliance monitoring staff and key safety management personnel in this training to provide a consistent presence and facilitate feedback.

There should be a procedure to ensure that feedback is formally reported by the trainers through the internal safety reporting scheme to initiate action where necessary.

Recurrent safety training should be delivered either as a dedicated course or else integrated within other training. It should be of an appropriate duration in each 2-year period, in relation to the relevant compliance monitoring audit findings and other internal/external sources of information available to the organisation on safety and HF issues.

(d) Safety training may be conducted by the organisation itself, independent trainers, or any training organisations acceptable to the NMAA.

AMC4 CAMO.A.305(g) Personnel requirements

OTHER TRAININGS

(a) The organisation should assess the need for particular training; for example, with regard to the competency standards established in EMAD 20 "On the use of EASA's General Acceptable Means of Compliance for Airworthiness of Products, Parts and Appliances (AMC 20) in the Military Environment" (AMC 20-22 'Electrical Wiring Interconnection System' (EWIS) and EMAD 20-20 'Continuing Structural Integrity Programme') or 'Critical Design Configuration Control Limitations' (CDCCL).

(b) Guidance on fuel tank safety training is provided in Appendix III to AMC4 CAMO.A.305(g).

(c) 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.

(d) Personnel involved in developing and amending/reviewing the AMP, in assessing its effectiveness and/or working on reliability programme, should have knowledge of or be trained on statistical analysis and reliability method and the applicable methodology used in developing, as part of the Instructions for Continuing Airworthiness (ICA), the manufacturer recommended maintenance programme (such as maintenance steering group logic).

AMC5 CAMO.A.305(g) Personnel requirements

INITIAL AND RECURRENT TRAINING

(a) Adequate initial and recurrent training should be provided and recorded to ensure that staff remain competent.

(b) Recurrent training should take into account certain information reported through the internal safety reporting scheme (see point (c)(3) of AMC1 CAMO.A.202).

GM1 CAMO.A.305(g) Personnel requirements

SAFETY TRAINING (INCLUDING HUMAN FACTORS)

(a) The scope of the safety training and the related training programme will differ significantly depending on the size and complexity of the organisation. Safety training should reflect the evolving management system, and the changing roles of the personnel who make it work.

(b) In recognition of this, training should be provided to management and staff at least:

(1) during the initial implementation of safety management processes;

(2) for all new staff or personnel recently allocated to any safety management related task;

(3) on a regular basis to refresh their knowledge and to understand changes to the management system;

(4) when changes in personnel affect safety management roles, and related accountabilities, responsibilities, and authorities; and

NOTE: In the context of safety management, the term ‘authority’ is used in relation to the level of management in the organisation that is necessary to make decisions related to risk tolerability.

(5) when performing dedicated safety functions in domains such as safety risk management, compliance monitoring, internal investigations.

(c) Safety training is subject to the record-keeping requirements in EMAR CAMO.A.220(c).

GM2 CAMO.A.305(g) Personnel requirements

TRAINING SYLLABUS FOR INITIAL SAFETY TRAINING

The training syllabus below identifies the topics and subtopics that should be addressed during the safety training.

The CAMO may combine, divide, or change the order of any of the subjects in the syllabus to suit its own needs, as long as all the subjects are covered to a level of detail that is appropriate for the organisation and its personnel, including the varying level of seniority of that personnel.

Some of the topics may be covered in separate training courses (e.g. health and safety, management, supervisory skills, etc.) in which case duplication of the training is not necessary. Where possible, practical illustrations and examples should be used, especially accident and incident reports.

Topics should be related to existing legislation, where relevant. Topics should be related to existing guidance/advisory material, where relevant (e.g. ICAO HF Digests and Training Manual).

Topics should be related to continuing airworthiness management and maintenance engineering where possible; too much unrelated theory should be avoided.

1 General/Introduction to safety management and HF

- 1.1 Need to address safety management and HF
- 1.2 Statistics
- 1.3 Incidents

1a. Safety risk management

- 1a.1. Hazard identification
- 1a.2. Safety risk assessment
- 1a.3. Risk mitigation and management
- 1a.4. Effectiveness of safety risk management

2 Safety Culture/Organisational factors

- 2.1 Justness/Trust
- 2.2 Commitment to safety
- 2.3 Adaptability
- 2.4 Awareness
- 2.5 Behaviour
- 2.6 Information

3 Human error

- 3.1 Error models and theories
- 3.2 Types of errors in continuing airworthiness management and maintenance tasks
- 3.3 Violations
- 3.4 Implications of errors
- 3.5 Avoiding and managing errors
- 3.6 Human reliability

4 Human performance & limitations

- 4.1 Vision
- 4.2 Hearing
- 4.3 Information-processing
- 4.4 Attention and perception
- 4.5 Situational awareness
- 4.6 Memory
- 4.7 Claustrophobia and physical access
- 4.8 Motivation
- 4.9 Fitness/Health

- 4.10 Stress
- 4.11 Workload management
- 4.12 Fatigue
- 4.13 Alcohol, medication, drugs
- 4.14 Physical work
- 4.15 Repetitive tasks/complacency

5 Environment

- 5.1 Peer pressure
- 5.2 Stressors
- 5.3 Time pressure and deadlines
- 5.4 Workload
- 5.5 Shift work
- 5.6 Noise and fumes
- 5.7 Illumination
- 5.8 Climate and temperature
- 5.9 Motion and vibration
- 5.10 Complex systems
- 5.11 Other hazards in the workplace
- 5.12 Lack of manpower
- 5.13 Distractions and interruptions
- 5.14 Military operations, military deployments

6 Procedures, information, tools and practices

- 6.1 Visual inspection
- 6.2 Work logging and recording
- 6.3 Procedure — practice/mismatch/norms
- 6.4 Technical documentation — access and quality

7 Communication

- 7.1 Shift/Task handover
- 7.2 Dissemination of information
- 7.3 Cultural differences (e.g. multinational operations)

8 Teamwork

- 8.1 Responsibility
- 8.2 Management, supervision and leadership
- 8.3 Decision-making

9 Professionalism and integrity

9.1 Keeping up to date; currency

9.2 Avoiding error-provoking behaviour

9.3 Assertiveness

10 Organisation's safety programme

10.1 Safety policy and objectives, just culture principles

10.2 Reporting errors and hazards, internal safety reporting scheme

10.3 Investigation process

10.4 Action to address problems

10.5 Feedback and safety promotion

GM3 CAMO.A.305(g) Personnel requirements

COMPETENCY OF THE SAFETY MANAGER

The competency of a safety manager should include, but not be limited to, the following:

(a) knowledge of ICAO elements and European military requirements on safety management;

(b) an understanding of management systems, including compliance monitoring systems;

(c) an understanding of risk management;

(d) an understanding of safety investigation techniques and root cause methodologies;

(e) an understanding of HF;

(f) understanding and promotion of a positive safety culture;

(g) operational experience related to the activities of the organisation;

(h) safety management experience;

(i) interpersonal and leadership skills, and the ability to influence staff;

(j) oral and written communications skills;

(k) data management, analytical and problem-solving skills.

AMC1 CAMO.A.310(a) Airworthiness Review Staff qualifications

GENERAL

(a) ARS are only required if the CAMO wants to be granted CAMO.A.125(e) airworthiness review privilege and, if applicable, CAMO.A.125(f) Military Permit to Fly privileges.

(b) 'Experience in continuing airworthiness' means any appropriate combination of experience in tasks related to aircraft maintenance and/or continuing airworthiness management and/or surveillance of such tasks.

(c) A person qualified according to AMC1 CAMO.A.305(c) subparagraph (e) should be considered as holding the equivalent to an aeronautical degree.

(d) An appropriate licence in compliance with EMAR 66 is any one of the following:

− a category B1 licence in the subcategory of the aircraft reviewed, or

− a category B2 or C licence.

It is not necessary to satisfy the experience requirements of EMAR 66 at the time of the review.

(e) To hold a position with appropriate responsibilities means the ARS should have a position in the organisation independent from the airworthiness management process or with overall authority on the airworthiness management process of complete aircraft.
Independence from the airworthiness management process may be achieved, among other ways, as follows:

− By being authorised to perform airworthiness reviews only on aircraft for which the person has not participated in their management. For example, performing airworthiness reviews on a specific aircraft type, while being involved in the continuing airworthiness management of a different aircraft type.

− A CAMO also holding a maintenance organisation approval may nominate maintenance personnel from their maintenance organisation as ARS, as long as they are not involved in the airworthiness management of the aircraft. These personnel should not have been involved in the release to service of that particular aircraft (other than maintenance tasks performed during the physical survey of the aircraft or performed as a result of findings discovered during such physical survey) to avoid possible conflict of interests.

− By nominating as ARS personnel from the compliance monitoring department of the CAMO.

Overall authority on the airworthiness management process of complete aircraft may be achieved, among other ways, as follows:

− By nominating as ARS the accountable manager or the nominated post holder.

− By being authorised to perform airworthiness reviews only on those particular aircraft for which the person is responsible for the complete continuing airworthiness management process.

− In the case of one-man organisations, this person has always overall authority. This means that this person can be nominated as ARS.

AMC1 CAMO.A.310(a)(3) Airworthiness Review Staff qualifications

FORMAL AERONAUTICAL MAINTENANCE TRAINING

Formal aeronautical maintenance training means training (internal or external) supported by evidence on the following subjects:

− Relevant parts of initial and continuing airworthiness regulations;

− Relevant parts of operational requirements and procedures, if applicable;

− The organisation’s CAME;

− Knowledge of a relevant sample of the type(s) of aircraft gained through a formalised training course. These courses should be at least at a level equivalent to EMAR 66 Appendix III Level 1 (General Familiarisation) and could be provided by an EMAR 147 organisation, by the manufacturer, or by any other organisation accepted by the NMAA.

‘Relevant sample’ means that these courses should cover typical aircraft and aircraft systems that are within the scope of work.

− Maintenance methods.

AMC1 CAMO.A.310(c) Airworthiness Review Staff qualifications

FORMAL ACCEPTANCE BY THE NMAA

The approval by the NMAA of the CAME, containing, as specified in EMAR CAMO.A.300(a)(8), the nominative list of EMAR CAMO.A.305(e) personnel, constitutes the formal acceptance by the NMAA of the ARS.

If the airworthiness review is performed under the supervision of existing ARS, evidence should be provided to the NMAA.

The inclusion of an ARS in such CAME list also constitutes the formal authorisation by the organisation.

AMC1 CAMO.A.310(d) Airworthiness Review Staff qualifications

RECENT EXPERIENCE AND VALIDITY

In order to keep the validity of the ARS authorisation, the ARS should have either:

− been involved in continuing airworthiness management activities for at least 6 months in every 2-year period, or

− conducted at least one airworthiness review in the last 12-month period.

In order to restore the validity of the authorisation, the ARS should conduct at a satisfactory level an airworthiness review under the supervision of the NMAA or, if accepted by the NMAA, under the supervision of another currently authorised ARS of the CAMO concerned in accordance with an approved procedure.

AMC1 CAMO.A.315 Continuing airworthiness management

The CAMO should have adequate knowledge of the design information and aircraft configuration (type specification, optional equipments, Airworthiness Directives (ADs), airworthiness limitations contained in the aircraft ICA, modifications, repairs, operational and emergency equipment) and of the required and performed maintenance. The status of aircraft configuration and maintenance should be adequately documented to support the management system.

Adequate knowledge of the airworthiness limitations should notably cover fuel tank system airworthiness limitations including critical design configuration control limitations (CDCCL), when applicable.

GM1 CAMO.A.315(b)(1) Continuing airworthiness management

AIRCRAFT MAINTENANCE PROGRAMME

In accordance with EMAR M.A.302, the CAMO requirement to ‘control’ the AMP includes in particular:

(i) NOT APPLICABLE;

(ii) the presentation of the AMP and its amendments to the NMAA for approval, unless the approval is covered by an indirect approval procedure in accordance with EMAR M.A.302(c).

AMC1 CAMO.A.315(b)(3) Continuing airworthiness management

When managing the approval of modifications or repairs, the organisation should ensure that CDCCL are taken into account.

AMC1 CAMO.A.315(b)(4) Continuing airworthiness management

ASSESSMENT OF NON-MANDATORY INFORMATION

The CAMO managing the continuing airworthiness of the aircraft should establish and work according to a policy, which assesses non-mandatory information (modification or inspections) related to the airworthiness of the aircraft. Non-mandatory information refers to Service Bulletins, service letters and other information that is produced for the aircraft and its components by an approved design organisation, the manufacturer, the NMAA or an organisation accepted by the NMAA.

GM1 CAMO.A.315(b)(5) Continuing airworthiness management

This requirement means that the CAMO is responsible for determining what maintenance is required, when it has to be performed, by which maintenance organisation and to what standard in order to ensure the continuing airworthiness of the aircraft.

AMC1 CAMO.A.315(c) Continuing airworthiness management

(a) As provided for in EMAR M.A.201, when the Operating Organisation is approved as a CAMO, or when the Operating Organisation contracts a CAMO, this CAMO is in charge of the continuing airworthiness management and this includes the tasks specified in EMAR M.A.301 (b), (c), (e), (f), (g) and (h).

If the CAMO does not hold the appropriate maintenance organisation approval (EMAR 145 approval), then the CAMO should conclude a contract with the appropriate organisation(s).

(b) The CAMO bears the responsibility for the airworthy condition of the aircraft for which it performs the continuing airworthiness management. Thus, it should be satisfied before the intended flight that all required maintenance has been properly carried out.

(c) The CAMO should agree with the Operating Organisation on the process to select a maintenance organisation before concluding any contract with a maintenance organisation.

(d) The fact that the CAMO has contracted a maintenance organisation should not prevent it from checking at the maintenance facilities on any aspect of the contracted work to fulfil its responsibility for the airworthiness of the aircraft.

(e) The contract between the CAMO and the maintenance organisation(s) should specify in detail the responsibilities and the work to be performed by each party.

(f) Both the specification of work and the assignment of responsibilities should be clear, unambiguous and sufficiently detailed to ensure that no misunderstanding arises between the parties concerned that could result in a situation where work that has an effect on the airworthiness or serviceability of aircraft is not or will not be properly performed.

(g) Special attention should be paid to procedures and responsibilities to ensure that all maintenance work is performed, Service Bulletins are analysed and decisions are taken on their accomplishment, Airworthiness Directives are accomplished on time and that all

work, including non-mandatory modifications, is carried out to approved data and to the latest standards.

(h) Appendix IV to AMC1 CAMO.A.315(c) gives further details on the subject.

AMC2 CAMO.A.315(c) Continuing airworthiness management

MAINTENANCE CONTRACT WITH ANOTHER CAMO/OPERATING ORGANISATION

(a) The purpose of EMAR CAMO.A.315(c) is to ensure that all maintenance is carried out by an appropriately approved maintenance organisation. It is acceptable to contract another Operating Organisation/CAMO (secondary Operating Organisation/CAMO) that does not hold a maintenance organisation approval when it proves that such a contract is in the interest of the CAMO by simplifying the management of its maintenance, and the CAMO keeps an appropriate control of it. In this case, the CAME should include appropriate procedures to ensure that all maintenance is ultimately carried out on time by approved maintenance organisations in accordance with appropriate maintenance data. In particular, the compliance monitoring and safety risk management procedures should place great emphasis on monitoring compliance with the above and ensuring proper hazard identification and management of risks associated with such contracting. The list of approved maintenance organisations, or a reference to this list, should be included in the CAME.

(b) This contract should not preclude the CAMO from ensuring that all maintenance is performed by appropriately approved organisations which comply with EMAR M.A.201. Typical arrangements are the following:

− Component maintenance:

The CAMO may find it more appropriate to have a primary contractor (the secondary Operating Organisation/CAMO) dispatching the components to appropriately approved organisations rather than sending themselves different types of components to various maintenance organisations approved under EMAR 145. The benefit for the CAMO is that the management of maintenance is simplified by having a single point of contact for component maintenance. The CAMO remains responsible for ensuring that all maintenance is performed by maintenance organisations approved under EMAR 145 and in accordance with appropriate maintenance data.

− Aircraft, engine and component maintenance:

The CAMO may wish to have a maintenance contract with a secondary Operating Organisation /CAMO not approved as maintenance organisation for the same type of aircraft. A typical case is that of a dry-leased aircraft between Operating Organisations where the parties, for consistency or continuity reasons (especially for short-term lease agreements), find it appropriate to keep the aircraft under the current maintenance arrangement. Where this arrangement involves various maintenance organisations, it might be more manageable for the lessee CAMO to have a single maintenance contract with the lessor Operating Organisation /CAMO. Whatever type of acceptable maintenance contract is concluded, the CAMO is required to exercise the same level of control on contracted maintenance, particularly through the person(s) nominated under EMAR CAMO.A.305(a) and the management system as referred to in EMAR CAMO.A.200.

GM1 CAMO.A.315(c) Continuing airworthiness management

LINE MAINTENANCE CONTRACT

NOT APPLICABLE.

GM1 CAMO.A.315(d) Continuing airworthiness management

WORK ORDERS

The intent of this paragraph is that maintenance contracts are not necessary when the CAME specifies that the relevant maintenance activity may be ordered through one-time work orders. This includes unscheduled line maintenance and may also include component maintenance up to engines, as long as the maintenance is manageable through work orders, in terms of both volume and complexity. It should be noted that this paragraph implies that even where base maintenance is ordered on a case-by-case basis, there should be a written maintenance contract.

AMC1 CAMO.A.325 Continuing airworthiness management data

MAINTENANCE DATA PROVIDED BY THE OPERATING ORGANISATION

When using maintenance data provided by the Operating Organisation, the CAMO is responsible for ensuring that this data is current. As a consequence, it should establish appropriate procedures or provisions in the contract with the Operating Organisation.

GM1 CAMO.A.325 Continuing airworthiness management data

MAINTENANCE DATA PROVIDED BY THE OPERATING ORGANISATION

The sentence ‘except when otherwise required by EMAR CAMO.A.220(a)’ refers to, in particular, the need to keep a copy of the Operating Organisation data which was used to perform continuing airworthiness activities not only during the contract period but also, if considered as record pursuant to EMAR CAMO.A.220(a)(2), for the period specified in EMAR CAMO.A.220(a)(5).

GM2 CAMO.A.325 Continuing airworthiness management data

EMAR CAMO.A.325 refers to ‘continuing airworthiness tasks referred to in EMAR CAMO.A.315’. As a consequence, this covers continuing airworthiness management tasks but not airworthiness reviews.

Airworthiness review requirements are indicated in EMAR CAMO.A.320 and the requirements for the corresponding record retention are contained in EMAR CAMO.A.220.

SECTION B - NATIONAL MILITARY AIRWORTHINESS AUTHORITY REQUIREMENTS

GM1 CAMO.B.120 Means of compliance

ALTERNATIVE MEANS OF COMPLIANCE

Alternative means of compliance that are used by a NMAA, or by a CAMO under its oversight, may be used by other NMAAs or another CAMO only if they are processed again in accordance with EMAR CAMO.B.120(d) and (e).

AMC1 CAMO.B.125(b) Information to the Agency

NOT APPLICABLE.

GM1 CAMO.B.125(b) Information to the Agency

NOT APPLICABLE.

GM2 CAMO.B.125(b) Information to the Agency

RECOMMENDED CONTENT FOR CONCLUSIVE SAFETY ANALYSES

NOT APPLICABLE.

GM3 CAMO.B.125(b) Information to the Agency

OCCURRENCES WHERE THE AGENCY IS THE COMPETENT AUTHORITY

NOT APPLICABLE.

AMC1 CAMO.B.200 Management system

ORGANISATIONAL STRUCTURE

(a) In deciding upon the required organisational structure, the NMAA should review:

  (1) the number of certificates to be issued, and the number and size of the potential CAMOs within that pMS;

  (2) the possible use of qualified entities and of the resources of the NMAAs of other pMS to fulfil the continuing oversight obligations;

  (3) the level of military aviation activity, number and complexity of aircraft and the size of the pMS' military aviation; and

  (4) the potential growth of activities in the field of military aviation.

(b) The NMAA should retain effective control of important surveillance functions and should not delegate them in such a way that CAMOs, in effect, regulate themselves in airworthiness matters.

(c) The set-up of the organisational structure should ensure that the various tasks and obligations of the NMAA do not solely rely on individuals. The continuous and undisturbed fulfilment of these tasks and obligations of the NMAA should also be guaranteed in case of frequent staff turn-over, illness, accident or leave of individual employees.

AMC2 CAMO.B.200 Management system

GENERAL

(a) The NMAA designated by each pMS should be organised in such a way that:

(1) there is specific and effective management authority in the conduct of all the relevant activities;

(2) the functions and processes described in the applicable requirements of EMARs, AMC, Airworthiness codes and standards, and Guidance Material (GM) may be properly implemented;

(3) the NMAA's organisation and operating procedures for the implementation of the applicable requirements of EMARs are properly documented and applied;

(4) all the NMAA's personnel who are involved in the related activities are provided with training where necessary;

(5) specific and effective provision is made for communicating and interfacing as necessary with the NMAAs of other pMS; and

(6) all the functions related to implementing the applicable requirements are adequately described.

(b) A general policy in respect of the activities related to the applicable requirements of EMARs should be developed, promoted, and implemented by the manager at the highest appropriate level; for example, the manager at the top of the functional area of the NMAA that is responsible for such activities.

(c) Appropriate steps should be taken to ensure that the policy is known and understood by all the personnel involved, and all the necessary steps should be taken to implement and maintain the policy.

(d) The general policy, whilst also satisfying the additional national regulatory responsibilities, should, in particular, take into account:

(1) NOT APPLICABLE;

(2) the provisions of the applicable EMARs and their AMC, Airworthiness codes and standards, and GM;

(3) the needs of Operating Organisations and industry;

(4) the needs of the NMAA.

(e) The policy should define specific objectives for the key elements of the organisation and processes for implementing the related activities, including the corresponding control procedures and the measurement of the achieved standard.

AMC1 CAMO.B.200(a)(1) Management system

DOCUMENTED POLICIES AND PROCEDURES

(a) The various elements of the organisation involved with the activities related to EMARs should be documented in order to establish a reference source for the establishment and maintenance of this organisation.

(b) The documented procedures should be established in a way that facilitates their use. They should be clearly identified, kept up to date, and made readily available to all the personnel who are involved in the related activities.

(c) The documented procedures should cover, as a minimum, all of the following aspects:

(1) policy and objectives;

(2) organisational structure;

(3) responsibilities and associated authority;

(4) procedures and processes;

(5) internal and external interfaces;

(6) internal control procedures;

(7) the training of personnel;

(8) cross-references to associated documents;

(9) assistance from other NMAAs, if applicable.

(d) It is likely that the information may be held in more than one document or series of documents, and suitable cross-referencing should be provided. For example, the organisational structure and job descriptions are not usually in the same documentation as the detailed working procedures. In such cases, it is recommended that the documented procedures should include an index of cross references to all such other related information, and the related documentation should be readily available when required.

GM1 CAMO.B.200(a)(2) Management system

SUFFICIENT PERSONNEL

(a) This GM on the determination of the required personnel is limited to the performance of certification and oversight tasks.

(b) The elements to be considered when determining who are the required personnel and planning their availability may be divided into quantitative and qualitative elements:

(1) Quantitative elements:

(i) the estimated number of initial certificates to be issued;

(ii) the number of organisations to be certified by the NMAA; and

(iii) the estimated number of subcontracted organisations used by certified organisations.

(2) Qualitative elements:

(i) the size, nature, and complexity of the activities of certified organisations, taking into account:

(A) the privileges of each organisation;

(B) the types of approval and the scope of work;

(C) possible certification to industry standards;

(D) the number of personnel; and

(E) the organisational structure and the existence of subsidiaries;

(ii) the safety priorities identified;

(iii) the results of past oversight activities, including audits, inspections and reviews, in terms of risks and regulatory compliance, taking into account:

(A) the number and the level of findings;

(B) the time frame for implementation of corrective actions; and

(C) the maturity of the management systems implemented by organisations, and their ability to effectively manage safety risks; and

(iv) the size and complexity of the pMS' military aviation and the potential growth of activities, which may be an indication of the number of new applications and changes to existing certificates to be expected.

(c) Based on the existing data from previous oversight cycles, and taking into account the situation within the pMS' military aviation, the NMAA may estimate:

(1) the standard working time required for processing applications for new certificates;

(2) the number of new certificates to be issued for each planning period; and

(3) the number of changes to existing certificates to be processed for each planning period.

(d) In line with the NMAA's oversight policy, the following planning data should be determined:

(1) the standard number of audits to be performed per oversight planning cycle;

(2) the standard duration of each audit;

(3) the standard working time for audit preparation, on-site audit, reporting, and follow-up, per inspector;

(4) the standard number of unannounced inspections to be performed;

(5) the standard duration of inspections, including preparation, reporting, and follow-up, per inspector; and

(6) the minimum number and the required qualification of the inspectors for each audit/inspection.

(e) The standard working time could be expressed either in working hours per inspector, or in working days per inspector. All planning calculations should then be based on the same unit (hours or working days).

(f) It is recommended that the NMAA use a spreadsheet application to process the data defined under (c) and (d), to assist in determining the total number of working hours/days per oversight planning cycle required for certification, oversight and enforcement activities. This application could also serve as a basis for implementing a system for planning the availability of personnel.

(g) The number of working hours/days per planning period for each qualified inspector that may be allocated for certification, oversight and enforcement activities should be determined, taking into account:

(1) purely administrative tasks that are not directly related to certification and oversight;

(2) training;

(3) participation in other projects;

(4) planned absence; and

(5) the need to include a reserve for unplanned tasks or unforeseeable events.

(h) The determination of the working time available for certification, oversight and enforcement activities should also consider, as applicable:

(1) the use of qualified entities;

(2) cooperation with other NMAAs for approvals that involve more than one pMS;

(3) NOT APPLICABLE.

(i) Based on the elements listed above, the NMAA should be able to:

(1) monitor the dates when audits and inspections are due, and when they were carried out;

(2) implement a system to plan the availability of personnel; and

(3) identify possible gaps between the number and qualification of personnel and the required volume of certification and oversight.

Care should be taken to keep planning data up to date in line with changes in the underlying planning assumptions, with particular focus on risk-based oversight principles.

AMC1 CAMO.B.200(a)(3) Management system

QUALIFICATION AND TRAINING — GENERAL

(a) It is essential for the NMAA to have the full capability to adequately assess the compliance and performance of an organisation by ensuring that the whole range of activities is assessed by appropriately qualified personnel.

(b) For each inspector, the NMAA should:

(1) define the competencies required to perform the allocated certification and oversight tasks;

(2) define the associated minimum qualifications that are required;

(3) establish initial and recurrent training programmes in order to maintain and to enhance the competency of inspectors at the level that is necessary to perform the allocated tasks; and

(4) ensure that the training provided meets the established standards, and is regularly reviewed and updated whenever necessary.

(c) The NMAA may provide training through its own organisation with qualified trainers, or through another qualified training source.

(d) If training is not provided through an internal organisation, adequately experienced and qualified persons may act as trainers, provided that their training skills have been assessed. If required, an individual training plan should be established that covers specific training skills. Records should be kept of such training, and of the assessment, as appropriate.

AMC2 CAMO.B.200(a)(3) Management system

QUALIFICATION AND TRAINING — INSPECTORS

(a) NMAA inspectors should have:

(1) practical experience and expertise in the application of aviation safety standards and safe operating practices;

(2) comprehensive knowledge of:

(a) the relevant parts of the EMARs, Airworthiness codes and standards and AMC and GM;

(b) the NMAA's procedures;

(c) the rights and obligations of an inspector;

(d) safety management systems based on the EMARs' management system requirements (including compliance monitoring) and Appendix I to Annexes B and C of BFD;

(e) continuing airworthiness management including maintenance programme development and control;

(f) operational procedures that affect the continuing airworthiness management of the aircraft or its maintenance; and

(g) maintenance-related HF and human performance principles;

(3) training on auditing techniques and assessing and evaluating management systems and safety risk management processes.

(4) 5 years of relevant work experience for them to be allowed to work independently as inspectors. This may include experience gained during training to obtain the qualification mentioned below in point (a)(5);

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

(6) knowledge of a relevant sample of the type(s) of aircraft gained through a formalised training course. These courses should be at least at a level equivalent to EMAR 66 Appendix III Level 1 General Familiarisation.

'Relevant sample' means that these courses should cover typical aircraft and aircraft systems that are within the scope of work; and

(7) knowledge of maintenance standards, including fuel tank safety (FTS) training as described in Appendix III to AMC4 CAMO.A.305(g).

(b) In addition to technical competency, inspectors should have a high degree of integrity, be impartial in carrying out their tasks, be tactful, and have a good understanding of human nature.

(c) A programme for recurrent training should be developed that ensures that the inspectors remain competent to perform their allocated tasks. As a general policy, it is not desirable for the inspectors to obtain technical qualifications from those entities that are under their direct regulatory oversight.

AMC3 CAMO.B.200(a)(3) Management system

INITIAL AND RECURRENT TRAINING — INSPECTORS

(a) Initial training programme:

The initial training programme for inspectors should include, as appropriate to their role, current knowledge, experience and skills in at least all of the following:

(1) national military aviation legislation, organisation, and structure;

(2) if required by the NMAA, the Chicago Convention, the relevant ICAO Annexes and Documents;

(3) NOT APPLICABLE;

(4) overview of the BFD;

(5) continuing airworthiness EMARs as well as any other applicable requirements;

(6) management systems, including the assessment of the effectiveness of a management system, in particular hazard identification and risk assessment, and non-punitive reporting techniques in the context of the implementation of a 'just culture';

(7) auditing techniques;

(8) procedures of the NMAA that are relevant to the inspectors' tasks;

(9) HF principles;

(10) the rights and obligations of inspecting personnel of the NMAA;

(11) on-the-job training that is relevant to the inspector's tasks; and

(12) technical training, including training on aircraft-specific subjects, that is appropriate to the role and tasks of the inspector, in particular for those areas that require approvals.

NOTE: The duration of the on-the-job training should take into account the scope and complexity of the inspector's tasks. The NMAA should assess whether the required competency has been achieved before an inspector is authorised to perform a task without supervision.

(b) Recurrent training programme

Once qualified, the inspector should undergo training periodically, as well as whenever deemed necessary by the NMAA, in order to remain competent to perform the allocated tasks. The recurrent training programme for inspectors should include, as appropriate to their role, at least the following topics:

(1) changes in national military aviation legislation, the operational environment and technologies;

(2) procedures of the NMAA that are relevant to the inspector's tasks;

(3) technical training, including training on aircraft-specific subjects, that is appropriate to the role and tasks of the inspector; and

(4) results from past oversight.

(c) An assessment of an inspector's competency should take place at regular intervals that do not exceed 3 years. The results of these assessments, as well as any actions taken

following the assessments, should be recorded.

AMC1 CAMO.B.200(a)(5) Management system

SAFETY RISK MANAGEMENT PROCESS

(a) The safety risk management process required by EMAR CAMO.B.200 should be documented.

The following should be defined in the related documentation:

(1) means for hazard identification, and the related data sources, taking into account, if applicable, data that comes from other NMAAs;

(2) risk management steps including:

(i) analysis (in terms of the probability and the severity of the consequences of hazards and occurrences);

(ii) assessment (in terms of tolerability); and

(iii) control (in terms of mitigation) of risks to an acceptable level;

(3) who holds the responsibilities for hazard identification and risk management;

(4) who holds the responsibilities for the follow-up of risk mitigation actions;

(5) the levels of management who have the authority to make decisions regarding the tolerability of risks;

(6) means to assess the effectiveness of risk mitigation actions; and

(7) the link with the compliance monitoring function.

(b) To demonstrate that the safety risk management process is operational, NMAA should be able to provide evidence that:

(1) the persons involved in internal safety risk management activities are properly trained;

(2) hazards that could impact the NMAA's capabilities to perform its tasks and discharge its responsibilities have been identified and the related risk assessment is documented;

(3) regular meetings take place at appropriate levels of management of the NMAA to discuss the risks identified, and to decide on the tolerability of risks and possible risk mitigations;

(4) in addition to the initial hazard identification exercise, the risk management process is triggered as a minimum whenever changes occur that may affect the NMAA's capability to perform any of the tasks required by EMAR CAMO;

(5) a record of the actions taken to mitigate risks is maintained, showing the status of each action and the owner of the action;

(6) there is a follow-up on the implementation of all risk mitigation actions;

(7) risk mitigation actions are assessed for their effectiveness; and

(8) the results of risk assessments are periodically reviewed to check whether they remain relevant. (Are the assumptions still valid? Is there new information?).

GM1 CAMO.B.200(a)(5) Management system

SAFETY RISK MANAGEMENT PROCESS

The purpose of safety risk management as part of the management system framework for NMAA is to ensure the effectiveness of the management system. As for any organisation, hazard identification and risk management is expected to contribute to effective decision-making, to guide the allocation of resources and contribute to organisational success.

The safety risk management process required by EMAR CAMO.B.200 is intended to address the safety risks that are directly related to the NMAA's organisation and processes, and which may affect its capability to perform its tasks and discharge its responsibilities. If applicable, the NMAA may use information and data that is obtained through the national State/Military Safety Programme, including oversight data and information, for the purpose of safety risk management as part of its management system.

The safety risk management process is also to be applied to the management of changes (EMAR CAMO.B.210), which is intended to ensure that the management system remains effective whenever changes occur.

AMC1 CAMO.B.200(d) Management system

PROCEDURES TO BE MADE AVAILABLE TO THE AGENCY

NOT APPLICABLE.

GM1 CAMO.B.205 Allocation of tasks to qualified entities

CERTIFICATION TASKS

The tasks that may be performed by a qualified entity on behalf of the NMAA include those that are related to the initial certification and to the continuing oversight of organisations as defined in continuing airworthiness EMARs.

AMC1 CAMO.B.220(a) Record-keeping

GENERAL

(a) The record-keeping system should ensure that all records are accessible within a reasonable time whenever they are needed. These records should be organised in a manner that ensures their traceability and retrievability throughout the required retention period.

(b) All records that contain sensitive data regarding applicants or organisations should be stored in a secure manner with controlled access to ensure confidentiality.

(c) Records should be kept in paper form or in electronic format or a combination of the two.

Records that are stored on microfilm or optical discs are also acceptable. The records should remain legible and accessible throughout the required retention period. The retention period starts when the record is created.

(d) Paper systems should use robust material which can withstand normal handling and filing.

Computer record systems should have at least one backup system, which should be updated within 24 hours of any new entry. Computer record systems should include safeguards against any unauthorised personnel from altering the data.

(e) All computer hardware that is used to ensure the backup of data should be stored in a different location from the one that contains the working data, and in an environment that ensures that the data remains in a good condition. When hardware or software changes take place, special care should be taken to ensure that all the necessary data continues to be accessible throughout at least the full period specified in EMAR CAMO.B.220(c).

AMC1 CAMO.B.220(a)(1) Record-keeping

NMAA MANAGEMENT SYSTEM

Records that are related to the NMAA's management system should include, as a minimum, and as applicable:

(a) the documented policies and procedures;

(b) the personnel files of the NMAA's personnel, with the supporting documents related to their training and qualifications;

(c) the results of the NMAA's internal audit and safety risk management processes, including audit findings, and corrective, preventive and risk mitigation actions; and

(d) the contract(s) established with any qualified entities that perform certification or oversight tasks on behalf of the NMAA.

AMC1 CAMO.B.220(d) Record-keeping

REQUEST BY A NMAA OF ANOTHER pMS

The cases, when records shall be made available should be limited to:

− incidents or accidents;

− findings through the Aircraft Continuing Airworthiness Monitoring (ACAM) programme where organisations approved by another NMAA are involved, to determine the root cause;

− aircraft mainly operated in another pMS;

− aircraft previously operated in another pMS;

− organisations having approvals in several pMSs.

When records are requested from another pMS, the reason for the request should be clearly stated. The records can be made available by sending a copy or by allowing their consultation.

AMC1 CAMO.B.300(a);(b);(c) Oversight principles

MANAGEMENT SYSTEM ASSESSMENT

As part of the initial certification of an organisation, the NMAA should assess the organisation's management system and processes to make sure that all the required enablers of a functioning management system are present and suitable.

As part of its continuing oversight activities, the NMAA should verify that the required enablers remain present and operational, and assess the effectiveness of the organisation's management system and processes.

When significant changes take place in the organisation, the NMAA should determine whether there is a need to review the existing assessment to ensure that it is still appropriate.

AMC1 CAMO.B.300(f) Oversight principles

INFORMATION DEEMED USEFUL FOR OVERSIGHT

This information should include, as a minimum:

(a) any occurrence reports received by the NMAA;

(b) the results of the following types of inspections and surveys if they indicate an issue that originates from a EMAR CAMO organisation:

  (i) NOT APPLICABLE;

  (ii) product surveys of aircraft pursuant to EMAR M.B.303;

  (iii) results of aircraft sample surveys conducted pursuant to EMAR CAMO.B.305(b)(1); and

  (iv) results of physical surveys or partial airworthiness reviews performed by the NMAA in line with EMAR M.B.901.

AMC1 CAMO.B.305(a);(b) Oversight programme

ANNUAL REVIEW

(a) The oversight planning cycle and the related oversight programme for each organisation should be reviewed annually to ensure that they remain adequate regarding any changes in the nature, complexity or the safety performance of the organisation.

(b) When reviewing the oversight planning cycle and the related oversight programme, the NMAA should also consider any relevant information collected in accordance with EMAR CAMO.A.160 and EMAR CAMO.B.300(f).

AMC1 CAMO.B.305(b) Oversight programme

SPECIFIC NATURE AND COMPLEXITY OF THE ORGANISATION — RESULTS OF PAST OVERSIGHT

When determining the oversight programme, including the product audits, the NMAA should consider in particular the following elements, as applicable:

(1) the effectiveness of the organisation’s management system in identifying and addressing non-compliances and safety hazards;

(2) the implementation by the organisation of any industry standards that are directly relevant to the organisation’s activity subject to continuing airworthiness EMARs;

(3) the procedure applied for and the scope of changes not requiring prior approval;

(4) any specific procedures implemented by the organisation that are related to any alternative means of compliance used;

(5) the number of approved locations and the activities performed at each location;

(6) the number and type of any subcontractors who perform continuing airworthiness management tasks; and

(7) the volume of activity for each aircraft type/model/series, as applicable.

AMC2 CAMO.B.305(b) Oversight programme

SUBCONTRACTED ACTIVITIES

When a CAMO subcontracts continuing airworthiness management tasks, all subcontracted organisations should also be audited by the NMAA at periods not exceeding the applicable oversight planning cycle (credits per AMC2 CAMO.B.305(c) point (d) are permitted) to ensure that the subcontracted continuing airworthiness management tasks are carried out in compliance with EMAR CAMO and EMAR M.

For these audits, the NMAA inspector should ensure that he or she is accompanied throughout the audit by a senior technical member of the CAMO.

NOTE: When a CAMO subcontracts continuing airworthiness management tasks, the NMAA should also ensure that the CAMO has sufficient control over the subcontracted organisation (see AMC1 CAMO.A.125(d)(3)).

AMC1 CAMO.B.305(b)(1) Oversight programme

AUDIT

(a) The oversight programme should indicate which aspects of the approval will be covered by each audit.

(b) Part of each audit should concentrate on the audit reports produced by the organisation's compliance monitoring function, to determine whether the organisation has been identifying and correcting its problems.

(c) At the conclusion of the audit, the auditing inspector should complete an audit report that identifies the areas and processes that were audited, and includes all findings that were raised.

(d) At the completion of each oversight planning cycle, a new EMAR Form 13 EMAR CAMO Approval Recommendation Report should be issued.

AMC1 CAMO.B.305(c) Oversight programme

OVERSIGHT PLANNING CYCLE — AUDIT AND INSPECTION

(a) When determining the oversight planning cycle and defining the oversight programme, the NMAA should assess the risks related to the activity of each organisation, and adapt the oversight to the level of risk identified and to the effectiveness of the organisation's management system, in particular its ability to effectively manage safety risks.

(b) The NMAA should establish a schedule of audits and inspections that is appropriate to each organisation. The planning of audits and inspections should take into account the results of the hazard identification and the risk assessment conducted and maintained by the organisation as part of the organisation's management system. Inspectors should work in accordance with the schedule provided to them.

(c) When the NMAA, having regard to the level of risk identified and the effectiveness of the organisation's management system, varies the frequency of an audit or inspection, it should ensure that all aspects of the organisation's activity are audited and inspected within the applicable oversight planning cycle.

AMC2 CAMO.B.305(c) Oversight programme

OVERSIGHT PLANNING CYCLE — AUDIT

(a) For each organisation certified by the NMAA, all processes should be completely audited at periods that do not exceed the applicable oversight planning cycle. The beginning of the first oversight planning cycle is normally determined by the date of issue of the first certificate. If the NMAA wishes to align the oversight planning cycle with the calendar year, it should shorten the first oversight planning cycle accordingly.

(b) The interval between two audits for a particular process should not exceed the interval of the applicable oversight planning cycle.

(c) Audits should include at least one on-site audit within each oversight planning cycle. For organisations who carry out their regular activity at more than one site, the determination of the sites to be audited should consider the results of past oversight activities and the volume of activities at each site, as well as main risk areas identified.

(d) For organisations holding more than one certificate, the NMAA may define an integrated oversight schedule to include all the applicable audit items. In order to avoid any duplication of audits, credit may be granted for specific audit items that have already been completed during the current oversight planning cycle, provided that:

(1) the specific audit item is the same for all the certificates under consideration;

(2) there is satisfactory evidence on record that those specific audit items were carried out, and that all the related corrective actions have been implemented to the satisfaction of the NMAA;

(3) the NMAA is satisfied that there is no evidence that standards have deteriorated regarding those specific audit items for which credit is granted;

(4) the interval between two audits for the specific item for which credit is granted does not exceed the applicable oversight planning cycle.

AMC1 CAMO.B.305(d) Oversight programme

EXTENSION OF THE OVERSIGHT PLANNING CYCLE BEYOND 24 MONTHS

(a) If the NMAA applies an oversight planning cycle that exceeds 24 months, it should, at a minimum, perform one focused inspection of the organisation (inspection of a specific area, element or aspect of the organisation) within each 12-month segment of the cycle to support the extended oversight programme.

NOTE: Where another inspection can be linked to the oversight of the organisation (e.g. when an aircraft managed by the organisation is inspected through ACAM survey), then the NMAA may take credit of such inspection to maintain the extension beyond 24 months.

(b) If the results of this inspection indicate a decrease in the safety performance or regulatory compliance of the organisation, the NMAA should revert to a 24-month (or less) oversight planning cycle and review the oversight programme accordingly.

(c) In order to be able to approve an oversight planning cycle of beyond 36 months, the NMAA should agree on the format and contents of the continuous reporting to be made by the organisation on its safety performance and regulatory compliance.

AMC1 CAMO.B.310 Initial certification procedure

VERIFICATION OF COMPLIANCE

(a) In order to verify the organisation's compliance with the applicable requirements, the NMAA should conduct an audit of the organisation, including interviews of the personnel, and inspections carried out at the organisation's facilities.

(b) The NMAA should only conduct such an audit if it 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.

(c) The audit should focus on the following areas:

(1) the detailed management structure, including the names and qualifications of personnel required by EMAR CAMO.A.305(a) and (b)(2), and the adequacy of the organisation and its management structure;

(2) the personnel:

(i) the adequacy of the number of staff, and of their qualifications and experience with regard to the intended terms of approval and the associated privileges;

(ii) the validity of licences and/or authorisations, as applicable;

(3) the processes for safety risk management and compliance monitoring;

(4) the facilities and their adequacy regarding the organisation's scope of work;

(5) the documentation based on which the certificate should be granted (i.e. the documentation required by EMAR CAMO):

(i) verification that the procedures specified in the CAME comply with the applicable requirements; and

(ii) verification that the accountable manager has signed the exposition statement.

(d) If an application for an organisation certificate is refused, the NMAA should notify this decision in writing to the organisation together with the reasons thereto.

AMC1 CAMO.B.310(a) Initial certification procedure

AUDIT

(a) The NMAA should determine how and by whom the audit shall be conducted.

For example, it will be necessary to determine whether one large team audit, a short series of small team audits, or a long series of single inspector audits is most appropriate for the particular situation.

(b) The audit may be structured so as to verify the organisation's processes related to a product line. For example, in the case of an organisation with CASA 295 and CASA 235 ratings, the audit should concentrate on the continuing airworthiness management processes of one type only for a full compliance check, and depending upon the result, the second type may only require a sample check against those aspects that were seen to be weak regarding compliance for the first type.

(c) In determining the scope of the audit and which activities of the organisation will be assessed during the audit, the privileges already granted to the organisation through other certifications should be taken into account (e.g. EMAR 21J approval to issue Military Permit to Fly, …).

(d) The NMAA auditing inspector should always ensure that he or she is accompanied throughout the audit by a senior member of the organisation, who is normally the compliance monitoring manager. The reason for being accompanied is to ensure that the organisation is fully aware of any findings raised during the audit.

(e) At the end of the audit, the auditing inspector should inform the senior member of the organisation of all the findings that were raised during the audit.

AMC1 CAMO.B.310(c) Initial certification procedure

(a) There may be occasions when the NMAA inspector is unsure about the compliance of some aspects of the applicant's organisation. If this occurs, the inspector should inform the organisation about the possible non-compliance at the time, and about the fact that the situation will be reviewed within the NMAA before a decision is made. If the review concludes that there is no finding, then a verbal confirmation to the organisation should suffice.

(b) Findings should be recorded on the audit report form, each with a provisional categorisation as a level 1 or 2 finding. Subsequent to the on-site audit that identified the particular findings, the NMAA should review the provisional finding levels, adjusting them if necessary, and should change the categorisation from ‘provisional’ to ‘confirmed’.

AMC2 CAMO.B.310(c) Initial certification procedure

(a) The audit should be recorded using the audit report EMAR Form 13 (Appendix V to AMC2 CAMO.B.310(c)).

(b) A review of the EMAR Form 13 audit report should be carried out by a competent independent person nominated by the NMAA. The review should take into account the relevant points of EMAR CAMO, the categorisation of the finding levels and the closure action that was taken. A satisfactory review of the audit report should be indicated by a signature on EMAR Form 13.

(c) The audit reports should include the date when each finding was closed, together with a reference to the NMAA report or letter that confirmed the closure.

AMC1 CAMO.B.310(d) Initial certification procedure

All findings should be confirmed in writing to the applicant organisation within 4 weeks of the on-site audit.

GM1 CAMO.B.310(e)(1); CAMO.B.330 Initial certification procedure and changes

TERMS OF APPROVAL

The table shown for the terms of approval in EMAR Form 14 includes a field designated as ‘Aircraft type/model/series’.

The intention is to give maximum flexibility to the NMAA to customise the approval to a particular organisation.

Possible alternatives to be included in this field are the following:

− A specific type designation that is part of a type certificate, such as Tiger HAP, Rafale F4, A109/LUHS.

− Series means a specific type series such as Tiger series, A320 series or Rafale series, which may be further subdivided, such as Tiger HAD/HAP, A320-200 series, Rafale F3/F4.

Reference to the engine type installed in the aircraft may or may not be included, as necessary.

It is important to note that the terms of approval defined in EMAR Form 14 is further limited to the scope of work defined in the CAME. It is this scope of work in the CAME which ultimately defines the approval of the organisation.

Nevertheless, in all cases, the NMAA should be satisfied that the organisation has the capability of managing the types/model/series endorsed in EMAR Form 14.

Since the activities linked to continuing airworthiness management are mainly process-oriented rather than facility/tooling-oriented, changes to the detailed scope of work defined in the CAME (either directly or through a capability list), within the limits already included in EMAR Form 14, may be considered as not affecting the approval and not subject to EMAR CAMO.A.130(a). As a consequence, for these changes, the NMAA may allow the use by the CAMO of the procedure referred to in EMAR CAMO.A.130(c) for changes not requiring prior approval.

AMC1 CAMO.B.310(e)(2) Initial certification procedure

(a) The NMAA should indicate its approval of the CAME in writing.

(b) Contracts for subcontracting continuing airworthiness management tasks by CAMOs should be referenced in the CAME and accessible to the NMAA. The NMAA should verify that the standards set forth in AMC1 CAMO.A.125(d)(3) have been met when approving the exposition.

(c) The NMAA while investigating the acceptability of the proposed subcontracted continuing airworthiness management tasks arrangements should take into account, in the subcontracted organisation, all other such contracts that are in place in terms of sufficiency of resources, expertise, management structure, facilities and liaison between the CAMO, the subcontracted organisation and, where applicable, the contracted maintenance organisation(s).

(d) Approval of the CAME constitutes formal acceptance of personnel specified in EMAR CAMO.A.305(a), EMAR CAMO.A.305(b)(2), EMAR CAMO.A.305(e) and EMAR CAMO.A.305(f).

(e) The NMAA may reject an accountable manager if there is clear evidence that this person previously held a senior position in any organisation that was approved in accordance with EMARs and that the person abused that position by not complying with the applicable requirements.

(e) The initial approval of the aircraft technical log system required by EMAR M.A.306(b) and EMAR M.B.305 may be done by approving the CAME in which this system should be described.

AMC1 CAMO.B.330 Changes

(a) The NMAA should have adequate control over any changes to the personnel specified in EMAR CAMO.A.305(a), (b)(2), (e) and (f). Such changes in personnel will require an amendment to the exposition.

(b) When an organisation submits the name of a new nominee for any of the personnel specified in EMAR CAMO.A.305(a), (b)(2) and (e), the NMAA may require the

organisation to produce a written résumé of the proposed person's qualifications. The NMAA should reserve the right to interview the nominee or call for additional evidence of his or her suitability before deciding upon him or her being acceptable.

(c) For changes requiring prior approval, in order to verify the organisation's compliance with the applicable requirements, the NMAA should conduct an audit of the organisation, limited to the extent of the changes, and determine whether a risk assessment needs to be provided by the organisation.

(d) If a risk assessment is deemed to be necessary, the NMAA should inform the organisation accordingly.

(e) If the NMAA considers that it is necessary to review the risk assessment performed by the organisation, it should request the organisation to provide it, and assess its result.

(f) If required, the audit may include interviews and inspections carried out at the organisation’s facilities.

(g) The applicable part(s) of EMAR Form 13 should be used to document the assessment of any changes to the EMAR CAMO approval.

GM1 CAMO.B.330 Changes

CHANGE OF THE NAME OF THE ORGANISATION

(a) On receipt of the application and the amendment to the relevant parts of the CAME, the NMAA should reissue the certificate.

(b) A change of only the name does not require the NMAA to audit the organisation unless there is evidence that other aspects of the organisation have changed.

AMC1 CAMO.B.355(c) Suspension, limitation and revocation

INFORMATION ON THE SECURITY SITUATION

(a) The national security bodies generally advises against any non-essential travel to a country where hostile conditions, or a combination of the following conditions, reduce the level of security, and pose a high level of threat to personnel, as follows:

(1) international or internal armed conflict with frequent armed confrontation taking place, numerous casualties, and/or serious damages to infrastructures;

(2) a situation that could lead to war, or characterised by high internal or external tension that could escalate into instability in the short term; very poorly functioning institutions;

(3) relatively frequent terrorist attacks due to the presence of active terrorist groups, either domestic or transnational, and state authorities that are unable to ensure a satisfactory level of security; and

(4) frequent criminal violence that also targets non-nationals. State authorities have a limited ability to counter criminal activities and ensure security.

(b) Countries where the above conditions apply should not be considered to be compatible with the performance of on-site audits by the NMAA.

AMC & GM TO APPENDICES TO EMAR CAMO

AMC1 to Appendix I to EMAR CAMO — Continuing Airworthiness Management Organisation Certificate – EMAR Form 14

AMC1 to Appendix I to EMAR CAMO - Continuing Airworthiness Management Organisation Certificate - EMAR Form 14 is contained in the EMAR Forms document.

APPENDICES TO AMC & GM TO EMAR CAMO

Appendix I to AMC1 CAMO.A.115 - EMAR Form 2

EMAR Form 2 is contained in the EMAR Forms document.

Appendix II to AMC1 CAMO.A.125(d)(3) – Subcontracting of continuing airworthiness management tasks

1. Subcontracted continuing airworthiness management tasks

1.1. To actively control the standards of the subcontracted organisation, the CAMO should employ a person or group of persons who are trained and competent in the disciplines associated with EMAR CAMO. As such, they are responsible for determining what maintenance is required, when it has to be performed, by which maintenance organisation and to what standard in order to ensure the continuing airworthiness of the aircraft to be operated.

1.2. The CAMO should conduct a pre-subcontract audit to establish that the organisation to be subcontracted can achieve the standards required by EMAR CAMO in connection with the activities to be subcontracted.

1.3. The CAMO should ensure that the organisation to be subcontracted has sufficient and qualified personnel who are trained and competent in the functions to be subcontracted. In assessing the adequacy of personnel resources, the CAMO should consider the particular needs of those activities that are to be subcontracted, while taking into account the subcontracted organisations existing commitments.

1.4. To be appropriately approved to subcontract continuing airworthiness management tasks, the CAMO should have procedures for the management control of these arrangements. The CAME should contain relevant procedures to reflect its control of those arrangements made with the subcontracted organisation.

1.5. Subcontracted continuing airworthiness management tasks should be addressed in a contract between the CAMO and the subcontracted organisation. The contract should also specify that the subcontracted organisation is responsible for informing the CAMO that is in turn responsible for notifying the NMAA, of any subsequent changes that affect their ability to fulfil the contract.

1.6. The subcontracted organisation should use procedures which set out the manner of fulfilling its responsibilities with regard to the subcontracted activities. Such procedures may be developed by either the subcontracted organisation or the CAMO.

1.7. Where the subcontracted organisation develops its own procedures, they should be compatible with the CAME and the terms of the contract. These should be accepted by the NMAA as extended procedures of the CAMO and as such should be cross-referenced in the CAME. One current copy of the subcontracted organisation’s relevant procedures should be kept by the CAMO and should be accessible to the NMAA when needed.

Note: Should any conflict arise between the subcontracted organisation’s procedures and those of the CAMO, then the policy and procedures of the CAME will prevail.

1.8. The contract should also specify that the subcontracted organisation’s procedures may only be amended with the agreement of the CAMO. The CAMO should ensure that these amendments are compatible with its CAME and comply with EMAR CAMO.

The CAMO should nominate the person responsible for continued monitoring and acceptance of the subcontracted organisation’s procedures and their amendments. The controls used to fulfil this function should be clearly set out in the amendment section of the CAME detailing the level of CAMO involvement.

1.9. Whenever any elements of the continuing airworthiness management tasks are subcontracted, the CAMO personnel should have access to all relevant data in order to fulfil their responsibilities.

Note: The CAMO retains the authority to override, whenever necessary for the continuing airworthiness of their aircraft, any recommendation of the subcontracted organisation.

1.10. The CAMO should ensure that the subcontracted organisation continues to have qualified technical expertise and sufficient resources to perform the subcontracted tasks while complying with the relevant procedures. Failure to do so may invalidate the CAMO approval.

1.11. The contract should provide provisions for NMAA monitoring.

1.12. The contract should address the respective responsibilities to ensure that any findings arising from the NMAA monitoring will be closed to the satisfaction of the NMAA.

2. Accomplishment

This paragraph describes the topics which may be applicable to such subcontracting arrangements.

2.1. Scope of work

The type of aircraft and their registrations, engine types and/or components subject to the continuing airworthiness management tasks contract should be specified.

2.2. Aircraft Maintenance Programme development and amendment

The CAMO may subcontract the preparation of the draft AMP and any subsequent amendments. However, the CAMO remains responsible for assessing that the draft proposals meet its needs and for obtaining NMAA approval, where applicable; the relevant procedures should specify these responsibilities. The contract should also stipulate that any data necessary to substantiate the approval of the initial programme or an amendment to this programme should be provided for CAMO agreement and/or NMAA upon request.

2.3. Aircraft Maintenance Programme effectiveness and reliability

The CAMO should have a system in place to monitor and assess the effectiveness of the AMP based on maintenance and operational experience. The collection of data and initial assessment may be made by the subcontracted organisation; the required actions are to be endorsed by the CAMO.

Where reliability monitoring is used to establish the effectiveness of the AMP, this may be provided by the subcontracted organisation and should be specified in the relevant procedures. Reference should be made to the approved aircraft maintenance and reliability programmes. Participation of the CAMO's personnel in reliability meetings with the subcontracted organisation should also be specified.

When providing reliability data, the subcontracted organisation is limited to working with primary data/documents provided by the CAMO or data provided by the CAMO's contracted maintenance organisation(s) from which the reports are derived. The pooling of reliability data is permitted if it is acceptable to the NMAA.

2.4. Permitted variations to the AMP

The reasons and justification for any proposed variation to scheduled maintenance may be prepared by the subcontracted organisation. Acceptance of the proposed variation

should be granted by the CAMO. The means by which the CAMO acceptance is given should be specified in the relevant procedures. When outside the limits set out in the AMP, the CAMO is required to obtain approval by the NMAA.

2.5. Scheduled maintenance

Where the subcontracted organisation plans and defines maintenance checks or inspections in accordance with the approved AMP, the required liaison with the CAMO, including feedback, should be defined.

The planning control and documentation should be specified in the appropriate supporting procedures. These procedures should typically set out the CAMO's level of involvement in each type of check. This will normally involve the CAMO assessing and agreeing to a work specification on a case-by-case basis for base maintenance checks. For routine line maintenance checks, this may be controlled on a day-to-day basis by the subcontracted organisation subject to appropriate liaison and CAMO controls to ensure timely compliance. This may typically include but is not necessarily limited to:

- applicable work package, including work cards;
- scheduled component removal list;
- ADs to be incorporated;
- modifications to be incorporated.

The associated procedures should ensure that the CAMO is informed in a timely manner of the accomplishment of such tasks.

2.6. Compliance monitoring and risk assessment

The CAMO's management system should monitor the adequacy of the subcontracted continuing airworthiness management task performance for compliance with the contract and with EMAR CAMO and assess the risks entailed by such subcontracting. The terms of the contract should therefore include a provision allowing the CAMO to perform a surveillance (including audits and assessments) of the subcontracted organisation. The aim of the surveillance is primarily to investigate and judge the effectiveness of those subcontracted activities and thereby to ensure compliance with EMAR CAMO and the contract and mitigate related safety risks. Audit and assessment reports may be subject to review when requested by the NMAA.

2.7. Access to the NMAA

The contract should specify that the subcontracted organisation should always grant access to the NMAA.

2.8. Maintenance data

The maintenance data used for the purpose of the contract should be specified, together with those responsible for providing such documentation and the NMAA responsible for the acceptance/approval of such data, when applicable. The CAMO should ensure that such data, including revisions, is readily available to the CAMO personnel and to those in the subcontracted organisation who may be required to assess such data. The CAMO should establish a 'fast-track' means to ensure that urgent data is transmitted to the subcontractor in a timely manner. Maintenance data is defined in EMAR 145.A.45.

2.9. Airworthiness Directives (ADs)

While the various aspects of AD assessment, planning and follow-up may be accomplished by the subcontracted organisation, AD embodiment is performed by a maintenance organisation.

The CAMO is responsible for ensuring timely embodiment of the applicable ADs and is to be provided with notification of compliance. It, therefore, follows that the CAMO should have clear policies and procedures on AD embodiment supported by defined procedures which will ensure that the CAMO agrees to the proposed means of compliance.

The relevant procedures should specify:

− what information (e.g. AD publications, continuing airworthiness records, flight hours/cycles, etc.) the subcontracted organisation needs from the CAMO;

− what information (e.g. AD planning listing, detailed engineering order, etc.) the CAMO needs from the subcontracted organisation in order to ensure timely compliance with the ADs.

To fulfil the above responsibility, the CAMO should ensure that it receives current mandatory continued airworthiness information for the aircraft and equipment it is managing.

2.10. Service Bulletin (SB) modifications

The subcontracted organisation may be required to review and make recommendations on the embodiment of a SB and other associated non-mandatory material based on a clear policy established by the CAMO. This should be specified in the contract.

2.11. Mandatory life limitation or scheduled maintenance controls and component control/removal forecast

Where the subcontracted organisation performs planning activities, it should be specified that the organisation should receive the current flight cycles, flight hours, landings and/or calendar controlled details and/or any other applicable parameter, as applicable, at a frequency to be specified in the contract.

The frequency should be such that it allows the organisation to properly perform the subcontracted planning functions. It, therefore, follows that there will need to be adequate liaison between the CAMO, the contracted maintenance organisation(s) and the subcontracted organisation. Additionally, the contract should specify how the CAMO will be in possession of all current flight cycles, flight hours, etc., so that it may assure the timely accomplishment of the required maintenance.

2.12. Health monitoring

If the CAMO subcontracts health monitoring, the subcontracted organisation should receive all the relevant information to perform this task, including any parameter reading deemed necessary to be supplied by the CAMO for this control. The contract should also specify what kind of feedback information (such as engine limitation, appropriate technical advice, etc.) the organisation should provide to the CAMO.

2.13. Defect control

Where the CAMO has subcontracted the day-to-day control of Aircraft Technical Log deferred defects, this should be specified in the contract and should be adequately described in the appropriate procedures. The Operating Organisation’s Minimum Equipment List (MEL)/Configuration Deviation List (CDL) provides the basis for establishing which defects may be deferred and the associated limits. The procedures

should also define the responsibilities and actions to be taken for defects such as Aircraft On Ground (AOG) situations, repetitive defects, and damage beyond the type certificate holder's limits.

For all other defects identified during maintenance, the information should be brought to the attention of the CAMO which, depending upon the procedural authority granted by the NMAA, may determine that some defects can be deferred. Therefore, adequate liaison between the CAMO, its subcontracted organisation and contracted maintenance organisation should be ensured.

The subcontracted organisation should make a positive assessment of potential deferred defects and consider the potential hazards arising from the cumulative effect of any combination of defects. The subcontracted organisation should liaise with the CAMO to get its agreement following this assessment.

Deferment of MEL/CDL allowable defects can be accomplished by a contracted maintenance organisation in compliance with the relevant Aircraft Technical Log procedures, subject to the acceptance by the aircraft commander.

2.14. Occurrence reporting

All incidents and safety occurrences should be collected, and those that meet the reporting criteria should be reported as required by EMAR CAMO.A.160 in accordance with a procedure established by the CAMO (see GM1 CAMO.A.205).

2.15. Continuing airworthiness records

They may be maintained and kept by the subcontracted organisation on behalf of the CAMO, which remains the owner of these documents. However, the CAMO should be provided with the current status of AD compliance and life-limited parts and time-controlled components in accordance with the agreed procedures. The CAMO should also be granted unrestricted and timely access to the original records as and when needed. Online access to the appropriate information systems is acceptable.

The record-keeping requirements of EMAR CAMO.A.220 should be met. Access to the records by duly authorised members of the NMAA should be granted upon request.

2.16. Maintenance check flight (MCF) procedures

MCFs are performed under the control of the Operating Organisation in coordination with the CAMO. MCF requirements from the subcontracted organisation or contracted maintenance organisation should be agreed by the Operating Organisation/CAMO.

2.17. Communication between the CAMO and the subcontracted organisation

2.17.1. In order to fulfil its airworthiness responsibility, the CAMO needs to receive all the relevant reports and relevant maintenance data. The contract should specify what information should be provided and when.

2.17.2. Meetings provide one important cornerstone whereby the CAMO can fulfil part of its responsibility for ensuring the airworthiness of the operated aircraft. They should be used to establish good communication between the CAMO, the subcontracted organisation and the contracted maintenance organisation. The terms of the contract should include, whenever appropriate, the provision for a certain number of meetings to be held between the involved parties. Details of the types of liaison meetings and associated terms of reference of each meeting should be documented. The meetings may include but are not limited to all or a combination of:

(a) Contract review

Before the contract is enforced, it is very important that the technical personnel of both parties, that are involved in the fulfilment of the contract, meet in order to be sure that every point leads to a common understanding of the duties of both parties.

(b) Work scope planning meeting

Work scope planning meetings may be organised so that the tasks to be performed are commonly agreed.

(c) Technical meeting

Scheduled meetings should be organised in order to review on a regular basis and agree on actions on technical matters such as ADs, SBs, future modifications, major defects found during shop visit, reliability, etc.

(d) Compliance and performance meeting

Compliance and performance meetings should be organised in order to examine matters raised by the CAMO's surveillance and the NMAA's oversight activity and to agree on necessary preventive, corrective and risk mitigation actions.

(e) Reliability meeting

When a reliability programme exists, the contract should specify the involvement of the CAMO and of the subcontracted organisation in that programme, including their participation in reliability meetings. Provision to enable NMAA participation in the periodical reliability meetings should also be made.

Appendix III to AMC4 CAMO.A.305(g) - Fuel Tank Safety training

The provisions of Appendix XII to AMC1 M.B.102(c) apply.

Appendix IV to AMC1 CAMO.A.315(c) - Contracted maintenance

1. Maintenance contracts

The following paragraphs are not intended to provide a standard maintenance contract, but to provide a list of the main points that should be addressed, when applicable, in a maintenance contract between the CAMO and the maintenance organisation. The following paragraphs only address technical matters and exclude matters such as costs, delay, warranty, etc.

When maintenance is contracted to more than one maintenance organisation (for example, aircraft base maintenance to X, engine maintenance to Y, and line maintenance to Z1, Z2 and Z3), attention should be paid to the consistency of the different maintenance contracts.

A maintenance contract is not normally intended to provide appropriate detailed work instructions to personnel. Accordingly, there should be established organisational roles and responsibilities, procedures and routines in the CAMO and the maintenance organisation to cover these functions in a satisfactory way such that any person involved is informed about his/her accountabilities, responsibilities and the procedures that apply. These procedures and routines can be included/appended to the CAME and to the maintenance organisation exposition (MOE), or can consist in separate procedures. In other words, procedures and routines should reflect the conditions of the contract.

2. Aircraft/engine maintenance

The following subparagraphs may be adapted to a maintenance contract that applies to aircraft base maintenance, aircraft line maintenance, and engine maintenance.

Aircraft maintenance also includes the maintenance of the engines and Auxiliary Power Units (APU) while they are installed on the aircraft.

2.1. Scope of work

The type of maintenance to be performed by the maintenance organisation should be specified unambiguously. In case of line and/or base maintenance, the contract should specify the aircraft type and, preferably, should include the aircraft's registrations.

In case of engine maintenance, the contract should specify the engine type.

2.2. Locations identified for the performance of maintenance/certificates held

The place(s) where base, line or engine maintenance, as applicable, will be performed should be specified. The certificate held by the maintenance organisation at the place(s) where maintenance will be performed should be referred to in the contract. If necessary, the contract may address the possibility of performing maintenance at any location subject to the need for such maintenance arising either from the unserviceability of the aircraft or from the necessity to support occasional line maintenance.

2.3. Subcontracting

The maintenance contract should specify under which conditions the maintenance organisation may subcontract tasks to a third party (regardless if this third party is approved or not). At least, the contract should make reference to EMAR 145.A.75(b). Additional guidance is provided by the associated AMC and GM. In addition, the CAMO may require the maintenance organisation to obtain the CAMO's approval before subcontracting to a third party.

Access should be given to the CAMO to any information (especially the compliance monitoring information) about the maintenance organisation's subcontractors involved in the contract. It should, however, be noted that under the CAMO responsibility both the CAMO and its NMAA are entitled to be fully informed about subcontracting, although the NMAA will normally only be concerned with aircraft, engine and APU subcontracting.

2.4. Maintenance programme

The maintenance programme, under which maintenance has to be performed, has to be specified.

The CAMO should have that maintenance programme approved by its NMAA.

2.5. Monitoring

The terms of the contract should include a provision allowing the CAMO to monitor the maintenance organisation in terms of compliance with the applicable requirements. The maintenance contract should specify how the results of such monitoring are taken into account by the maintenance organisation (See also paragraph 2.23. 'Meetings').

2.6. NMAA involvement

The contract should identify the NMAA responsible for the oversight of the aircraft, the Operating Organisation, the CAMO, and the maintenance organisation. Additionally, the contract should allow NMAA access to the maintenance organisation.

2.7. Maintenance data and other required data

The contract should specify the maintenance data and any other manual required for the fulfilment of the contract, and how these data and manuals are made available and kept current (regardless if they are provided by the CAMO or by the maintenance organisation).

This may include but is not limited to:

- maintenance programme,
- Airworthiness Directives,
- repairs/modification data,
- aircraft maintenance manual,
- aircraft Illustrated Parts Catalogue (IPC),
- wiring diagrams,
- troubleshooting manual,
- MEL (normally on board the aircraft),
- Operating Organisation's manual,
- aircraft flight manual,
- engine maintenance manual,
- engine overhaul manual.

2.8. Incoming conditions

The contract should specify in which condition/configuration (e.g. Government Furnished Equipment, military-specific systems may be removed, …) the aircraft should be made available to the maintenance organisation. For extensive maintenance, it may be

beneficial that a work scope planning meeting be organised so that the tasks to be performed may be commonly agreed (see also paragraph 2.23 ‘Meetings’).

2.9. Airworthiness Directives and Service Bulletins/modifications

The contract should specify the information that the CAMO is responsible to provide to the maintenance organisation, such as:

− the status of the ADs including due date and the selected means of compliance, if applicable; and

− status of modifications and the decision to embody a modification or an SB.

In addition, the contract should specify the type of information the CAMO will need in return to complete the control of ADs and modification status.

2.10. Hours and cycles control

Hours and cycles control is the responsibility of the CAMO, and the contract should specify how the CAMO should provide the current hours and cycles to the maintenance organisation and whether the maintenance organisation should receive the current flight hours and cycles on a regular basis so that it may update the records for its own planning functions (see also paragraph 2.22 ‘Exchange of information’).

2.11. Life-limited parts and time-controlled components

The control of life-limited parts and time-controlled components is the responsibility of the CAMO. The contract should specify whether the CAMO should provide the status of life-limited parts and time-controlled components to the maintenance organisation, and the information that this organisation will have to provide to the CAMO about the removal/installation of life-limited parts and time-controlled components so that the CAMO may update its records (see also paragraph 2.22 ‘Exchange of information’).

2.12. Supply of parts

The contract should specify whether a particular type of material or component is supplied by the CAMO or by the maintenance organisation, which type of component is pooled, etc. The contract should clearly state that it is the maintenance organisation’s responsibility to be satisfied that the component in question meets the approved data/standard and to ensure that the component is in a satisfactory condition for installation. Additional guidance on the acceptance of components is provided in EMAR M.A.501 and EMAR 145.A.42.

2.13. Pooled parts at line stations

If applicable, the contract should specify how the subject of pooled parts at line stations should be addressed.

2.14. Scheduled maintenance

For planning scheduled maintenance checks, the support documentation to be given to the maintenance organisation should be specified. This may include but is not limited to:

− applicable work package, including work cards;

− scheduled component removal list;

− modifications to be incorporated.

When the maintenance organisation decides, for any reason, to defer a maintenance task, it has to be formally agreed with the CAMO. If the deferment goes beyond an

approved limit, please refer to paragraph 2.17 ‘Deviation from the maintenance schedule’. This should be addressed, where applicable, in the maintenance contract.

2.15. Unscheduled maintenance/defect rectification

The contract should specify to which level the maintenance organisation may rectify a defect without reference to the CAMO. It should describe, as a minimum, the management of approval of repairs and the incorporation of repairs. The deferment of any defect rectification should be submitted to the CAMO.

2.16. Deferred tasks

See paragraphs 2.14 and 2.15 above, as well as EMAR 145.A.50(e). In addition, for aircraft line and base maintenance, the use of the Operating Organisation’s MEL and the liaison with the CAMO in case of a defect that cannot be rectified at the line station should be addressed.

2.17. Deviation from the maintenance schedule

Deviations from the maintenance schedule have to be managed by the CAMO in accordance with the procedures established in the maintenance programme. The contract should specify the support the maintenance organisation may provide to the Operating Organisation in order to substantiate the deviation request.

2.18. Maintenance check flight (MCF)

If any MCF is required after aircraft maintenance, it should be performed in accordance with the procedures established in the CAME and/or the Operating Organisation’s manual and/or aircraft flight manual and/or any other applicable maintenance documents.

2.19. Bench test

The contract should specify the acceptability criterion and whether a representative of the CAMO should witness an engine undergoing test.

2.20. Release to service documentation

The release to service has to be performed by the maintenance organisation in accordance with its maintenance organisation procedures. The contract should, however, specify which support forms have to be used (aircraft technical log, maintenance organisation’s release format, etc.) and the documentation that the maintenance organisation should provide to the CAMO upon delivery of the aircraft. This may include but is not limited to:

- Certificate of Release to Service,
- flight test report,
- list of modifications embodied,
- list of repairs,
- list of ADs accomplished,
- maintenance visit report,
- test bench report.

2.21. Maintenance record-keeping

The CAMO may subcontract the maintenance organisation to retain some of the maintenance records required by EMAR M Subpart C. This means that the CAMO

subcontracts under its management system part of its record-keeping tasks and, therefore, the provisions of EMAR CAMO.A.125(d)(3) apply.

2.22. Exchange of information

Each time exchange of information between the CAMO and the maintenance organisation is necessary, the contract should specify what information should be provided and when (i.e. in which case or at what frequency), how, by whom and to whom it has to be transmitted.

2.23. Meetings

The maintenance contract should include the provision for a certain number of meetings to be held between the CAMO and the maintenance organisation.

2.23.1. Contract review

Before the contract is enforced, it is very important that the technical personnel of both parties, that are involved in the fulfilment of the contract, meet in order to be sure that every point leads to a common understanding of the duties of both parties.

2.23.2. Work scope planning meeting

Work scope planning meetings may be organised so that the tasks to be performed may be commonly agreed.

2.23.3. Technical meeting

Scheduled meetings may be organised in order to review on a regular basis technical matters such as ADs, SBs, future modifications, major defects found during maintenance check, aircraft and component reliability, etc.

2.23.4. Compliance and performance meeting

Compliance and performance meetings may be organised in order to examine matters raised by the CAMO's monitoring and to agree upon necessary preventive and corrective actions.

2.23.5. Reliability meeting

When a reliability programme exists, the contract should specify the CAMO's and maintenance organisation's respective involvement in that programme, including the participation in reliability meetings.

Appendix V to AMC2 CAMO.B.310(c) - EMAR Form 13

EMAR Form 13 is contained in the EMAR Forms document.