

GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO (Revision January 2020)

Appendix II — Part-CAMO vs Part-MG Correspondence table and transition oversight policy

Potential transition findings are identified un blue		
Part-M subpart G requirement where applicable	Part-CAMO requirement	Oversight policy to be applied to grandfathered Part-CAMO from 24 March 2020 to 24 September 2021
M.A.702 - Application	CAMO.A.115 – Application for an organisation certificate	In case of non-compliance with CAMO.A.115(a)/(b)(2), an oversight finding should be raised and managed i.a.w. CAMO.B.350. CAMO.A.115(b)(1) is a new requirement for the organisation to provide the results of a pre-audit against the applicable requirements together with its application. When the organisation is grandfathered to Part-CAMO, provision of the result of that pre-audit is not mandatory at the time the Part-CAMO certificate is issued. If not already in place, the organisation should provide the competent authority with a procedure describing how changes not requiring prior approval will be managed and notified to the competent authority before 24 September 2021 (refer to CAMO.A.130).
N/A – New requirement introduced by Part-CAMO	CAMO.A.120 – Means of compliance	Potential transition finding if the organisation intends to use AltMoC: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition does not contain appropriate provisions to address CAMO.A.120 requirements”.
M.A.703 – Extend of approval	CAMO.A.125(a)/(b)/(c) – Terms of approval and privileges of the organisation	In case of non-compliance with CAMO.A.125(a)/(b)/(c), an oversight finding should be raised and managed i.a.w. CAMO.B.350. CAMO.A.125 covers both M.A.703 and M.A.711 requirements (refer to the line dedicated to M.A.711), M.A.711 ‘Privileges of the organisation’ is incorporated (new points (d) to (f)) and relevant references updated. Only minor changes are made to the text stemming from M.A.711 to update the cross references and replace ‘quality system’ with ‘management system’. The text is further amended to include the Part-M/Part-ML references for the extension of the ARC (cf. point (d)(4)) and for the issue of a recommendation for the airworthiness review by the competent authority (cf. point (e)(2)).
M.A.711 – Privileges of the organisation	CAMO.A.125(d)/(e)/(f) – Terms of approval and privileges of the organisation	In case of non-compliance with CAMO.A.125(d)/(e)/(f), an oversight finding should be raised and managed i.a.w. CAMO.B.350.
M.A.713 – Changes to the approved continuing airworthiness organisation	CAMO.A.130 – Changes to the organisation	Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition does not contain necessary provisions to address CAMO.A.130 requirements”. CAMO.A.130 introduces the term ‘changes not requiring prior approval’ replacing the ‘indirect approval’. Changes not requiring prior approval will be managed as agreed between the organisation and the authority. The organisation should amend current exposition to account for CAMO.A.130 before 24 September 2021. Until the organisation is fully compliant with Part-CAMO changes to the organisation should be managed i.a.w. the organisation current approved procedure. As a result, in case of non-compliance with M.A.713 and/or with the current procedure in place within the organisation, an oversight finding should be raised and managed i.a.w. CAMO.B.350.
M.A.715 – Continued validity of approval	CAMO.A.135 – Continued validity	Changes are made to update references and for consistency throughout the new Part-CAMO. In case of non-compliance with CAMO.A.135, an oversight finding should be raised and managed i.a.w. CAMO.B.350.
N/A – New requirement introduced by Part-CAMO	CAMO.A.140 - Access	A new CAMO.A.140 Access is added. It contains the requirements for granting access to the competent authority for the purpose of determining continued compliance. In case of non-compliance with CAMO.A.140, an oversight finding should be raised and managed i.a.w. CAMO.B.350 as this requirement was already existing in point (a)(2) of M.A.715 and is therefore not considered as a novelty.

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M.A.716 - Findings	CAMO.A.150 – Findings	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition procedure is not compliant with CAMO.A.150(a)(1)”.</p> <p>CAMO.A.150 add a requirement to identify the root causes of and contributing factors to the non-compliance. The organisation should amend current exposition to account for CAMO.A.150(a)(1) before 24 September 2021.</p> <p>In case of non-compliance with CAMO.A.150(a)(2)/(a)(3)/(b), an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p>
N/A –not explicit requirement in Part-MG	CAMO.A.155 – Immediate reaction to a safety problem	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition procedure is not compliant with CAMO.A.155”.</p> <p>CAMO.A.155 add a new requirement to implement any safety measures mandated by the competent authority and any relevant mandatory safety information issued by the Agency. Even if newly formally introduced through CAMO.A.155, this requirement is not considered as a novelty and apart from the case of the exposition update to account for that new article (refer to above transition finding), in case of non-compliance with CAMO.A.155, an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p>
N/A – Previous M.A.202 requirement transferred into Part-CAMO	CAMO.A.160 – Occurrence reporting	<p>A new CAMO.A.160 Occurrence reporting is added to introduce the occurrence reporting requirements applicable to CAMOs. As similar M.A.202 requirement applied to Part-MG organisation, CAMO.A.160 is not considered as a novelty and in case of non-compliances with CAMO.A.160, an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p>
M.A.712 – Quality system	CAMO.A.200 – Management system	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition procedure is not compliant with CAMO.A.200(a)(2)/(a)(3)/(a)(5)”.</p> <p>The organisation should amend current exposition quality system procedure to account for CAMO.A.200 and CAMO.A.202. Main novelties compared to M.A.712 are:</p> <ul style="list-style-type: none"> • CAMO.A.200(a)(2): Safety policy. • CAMO.A.200(a)(3): identification of aviation safety hazards and management of associated risks. • CAMO.A.200(a)(5): documentation of all management system key processes. <p>In case of non-compliance with CAMO.A.200(a)(1)/(a)(4)/(a)(6)/(a)(7)/(b)/(c)/(d) an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p>
	CAMO.A.202 – Internal safety reporting scheme	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition does not contain necessary provisions to address CAMO.A.160 requirements”.</p> <p>A new CAMO.A.202 Internal safety reporting scheme is added to establish an internal reporting scheme supporting the organisation’s hazard identification and safety risk management processes and fostering its safety culture. The internal reporting scheme shall also be accessible to organisations working under the CAMO’s management system. It also forms the basis for establishing mandatory and voluntary occurrence reporting as required by Regulation (EU) No 376/2014.</p> <p>The organisation should amend its procedures to account for CAMO.A.202 before 24 September 2021.</p>

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N/A - New requirement introduced in Part-CAMO	CAMO.A.205 – Contracting and subcontracting	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition procedure is not compliant with CAMO.A.205(a)(2)”.</p> <p>A new CAMO.A.205 Contracting and subcontracting is added to clarify the responsibility of the CAMO to ensure that any contracting (maintenance) or subcontracting (specific continuing-airworthiness-management-related activities) complies with applicable requirements. In this context it is important to clarify that the term ‘subcontracting’ covers cases where the contracted organisation is itself Part-CAMO or Part-CAO approved and cases where such organisation is not Part-CAMO/Part-CAO approved. Any continuing-airworthiness-management related services provided by third parties are to be considered ‘subcontracting under the management system’ for the purpose of Part-CAMO.</p> <p>The organisation should amend current exposition to account for CAMO.A.205(a)(2) before 24 September 2021. In case of non-compliance with CAMO.A.205(a)(1)(b), an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p>
M.A.705 - Facilities	CAMO.A.215 - Facilities	In case of non-compliance with CAMO.A.215, an oversight finding should be raised and managed i.a.w. CAMO.B.350
M.A.714(a)(1)/(a)(3)/(a)(4)/(a)(5)/(a)(6)/(f)/(e) – Records-keeping	CAMO.A.220(a)(1)/(a)(3)/(a)(4)/(a)(6)/(d)/(f) – Records-keeping	<p>In case of non-compliance with CAMO.A.220(a)(1)/(a)(3)/(a)(4)/(a)(6)/(d)/(f), an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p> <p>The record-keeping duration for aircraft related records is changed to 3 years after the responsibility for the aircraft has been permanently transferred, to align with the validity of the airworthiness review certificate (ARC) and 1 year for aircraft permanently withdrawn from service.</p> <p>In addition, record keeping duration for personnel records is 3 years after a person has left the organisation. This will ensure that for any ARC issued, personnel records will remain accessible for the entire ARC validity, including in the case a person has left the CAMO shortly after an ARC was issued.</p>
N/A – New requirement introduced by Part-CAMO	CAMO.A.220(a)(2)/(a)(5)/(b)/(e) – Records-keeping	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition is not compliant with CAMO.A.220(a)(2)/(a)(5)/(b)/(e)”.</p> <p>CAMO.A.220 Record-keeping includes management-system-. A record-keeping duration of 5 years for management-system-related records is introduced (the same record-keeping duration applies in the area of Aircrew and Air Operations). In addition, the organisation shall record all details of work carried out and the format of the records shall be specified in the organisation’s manual.</p>
M.A.706(h) – Personnel M.A.707(e) – Airworthiness Review Staff	CAMO.A.220(c) – Records-keeping	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition is not compliant with CAMO.A.220(c)”.</p> <p>CAMO.A.220 Record-keeping includes personnel related record-keeping. Personnel-related records (qualification and experience) shall include personnel involved in safety management and be kept until 3 years after a person has left the organisation.</p>
M.A.707(e) – Airworthiness Review Staff	CAMO.A.220(c)(1)(ii)/(2)/(3) – Records-keeping	In case of non-compliance with CAMO.A.220(c)(1)(ii)/(c)(2)/(c)(3), an oversight finding should be raised and managed i.a.w. CAMO.B.350 except if corresponding records have been kept for only 2 years.

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Part-M subpart G requirement where applicable	Part-CAMO requirement	Oversight policy to be applied to grandfathered Part-CAMO from 24 March 2020 to 24 September 2021
M.A.704 – Continuing airworthiness management exposition	CAMO.A.300 – Continuing airworthiness management exposition	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition is not compliant with CAMO.A.300”.</p> <p>CAMO.A.300 include additional management-system-related elements, such as:</p> <ul style="list-style-type: none"> • the safety policy, • a description of the internal safety reporting scheme (CAMO.A.202), • a general description of how the organisation ensures availability of staff (CAMO.A.305(d)), • a procedure defining the scope of changes not requiring prior approval and describing how such changes will be managed and notified (CAMO.A.115(b) and CAMO.A.130(c)), the procedures specifying how the organisation controls any contracted or subcontracted tasks, including contracted maintenance (CAMO.A.315(c)), • a list of currently approved alternative means of compliance and, if any, a procedure to issue an AltMOC. • The compliance statement in point (a)(1) is amended to cover all Part-M, Part-ML, and Part-CAMO requirements, as applicable. • In point (a)(11) additional clarification is provided on the procedures required specifying how the organisation ensures compliance with Part-CAMO, Part-M and Part-ML. • In point (a)(9), now (a)(12), the requirement for a list of approved maintenance programmes is clarified, by stating this is only relevant for aircraft for which a contract exists for continuing airworthiness management, not being required for initial approval of the CAMO. Accordingly, baseline and generic maintenance programmes are no longer required (see also CAMO.A.325). • Point (b) is reviewed to specify that the initial CAME is subject to competent authority approval. • A requirement to maintain the CAME to remain an up-to-date description of the organisation is also added. • Point (c) on amendments to the CAME refers to the changes requiring prior approval (cf. CAMO.A.130(a)) and to the new provisions on managing changes without prior competent authority approval, based on an agreed procedure. <p>The organisation should amend current exposition to account for CAMO.A.300 . As long as the organisation is not fully compliant with Part-CAMO, any non-compliance with CAMO.A.300 should be classified as a transition finding with 21/08/2021 as closure date except when there is a non-compliance with M.A.704 which should be classified i.a.w. CAMO.B.350.</p>
M.A.706(a)/(b)/(c)/(d)/(e)/(f)/(g)/(i)/(j)/(k) – Personnel requirements (also M.A.712(a))	CAMO.A.305(a)(1)/(a)(3)/(a)(4)/(a)(6)/(a)(7)/(b)/(c)/(d)/(e)/(f)/(g) – Personnel requirements	In case of non-compliance with CAMO.A.305(a)(1)/(a)(3)/(a)(4)/(a)(6)/(a)(7)/(b)/(c)/(d)/(e)/(f)/(g), an oversight finding should be raised and managed i.a.w. CAMO.B.350 except if the non-compliance concerns understanding of safety management and human factors principles appropriate to the person’s function and responsibilities where a transition finding should be raised.

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Part-M subpart G requirement where applicable	Part-CAMO requirement	Oversight policy to be applied to grandfathered Part-CAMO from 24 March 2020 to 24 September 2021
N/A - New requirement introduced in Part-CAMO	CAMO.A.305(a)(2)/(a)(5) – Personnel requirements	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition is not compliant with CAMO.A.305(a)(2)/(a)(5)”.</p> <ul style="list-style-type: none"> • CAMO.A.305 includes the nomination of a person or group of persons for the compliance monitoring function and for safety-management related responsibilities, to clarify the responsibilities of the accountable manager, and to state that competence must include an understanding of the application of safety management and human factors principles and human performance issues. • Additional changes are made to improve the overall structure of this IR and to clarify the link with Part-ORO. In particular, point (b)(1) states that for organisations also approved as licensed air carriers the accountable manager shall be the person appointed as accountable manager for the air carrier as required by point ORO.GEN.210(a) of Part-ORO. The requirement for a nominated postholder maintenance, included in point (b)(2), is aligned with Part-ORO (reference is made to ‘person responsible for the management and supervision of continuing airworthiness’). • A requirement is added for a system to plan the availability of staff to ensure that the organisation has sufficient appropriately qualified staff to plan, perform, supervise, inspect and monitor its activities in accordance with the terms of approval (new point (d)). • A new point (e) is added to include in CAMO.A.305 the reference to airworthiness review staff currently embedded in M.A.707 point (a). This way, CAMO.A.305 includes the requirements for all categories of staff and CAMO.A.310 may concentrate on airworthiness review staff qualification requirements.
M.A.707 – Airworthiness review staff	CAMO.A.310 – Airworthiness review staff qualification	<p>In case of non-compliance with CAMO.A.310, an oversight finding should be raised and managed i.a.w. CAMO.B.350 except if the non-compliance concerns understanding of safety management and human factors principles by Airworthiness Review Staff where a transition finding should be raised.</p> <ul style="list-style-type: none"> • M.A.707 point (j) on titles and names of persons to be kept updated in the CAME is deleted; this is already addressed in CAMO.A.300(a)(4). • M.A.707 point (k) is amended to require that competence include an understanding of safety management and human factors principles appropriate to the person’s function and responsibilities in the organisation and to include a reference to personnel involved in airworthiness reviews or recommendations, and, if applicable, issuing permits to fly, to reflect the new point CAMO.A.305(e). • specific qualification requirements not applicable within the scope of Part-CAMO are removed. • Point (d) on listing airworthiness review staff in the CAME is deleted as this is already addressed in point CAMO.A.300(a)(7). • These airworthiness review staff qualifications apply regardless of the aircraft managed, meaning for example that a Part-CAMO-approved organisation performing airworthiness reviews of aircraft other than CMPA may not use airworthiness review staff complying with the ‘lower’ requirements of the new Part-CAO.

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Part-M subpart G requirement where applicable	Part-CAMO requirement	Oversight policy to be applied to grandfathered Part-CAMO from 24 March 2020 to 24 September 2021
M.A.708 – Continuing airworthiness management	CAMO.A.315 – Continuing airworthiness management	<p>In case of non-compliance with CAMO.A.310, an oversight finding should be raised and managed i.a.w. CAMO.B.350 except in case of non-compliance with CAMO.A.315(b)(4) (default in using the organisation’s safety risk management process) where a transition finding should be raised.</p> <ul style="list-style-type: none"> • CAMO.A.315 Continuing airworthiness management is reviewed to eliminate overlaps with M.A.301. The underlying principle is that purely technical requirements are included in Part-M and that Part-CAMO focuses on the related organisational responsibilities. This will improve consistency and facilitate future amendments. • Additional changes are made to update relevant cross references. Point (c) is amended to update the reference to ‘CAT’ by ‘licensed air carriers in accordance with Regulation (EC) No 1008/2008’, and to include the consultation with the operator. As a Part-CAMO-approved organisation may also manage the continuing airworthiness of other than CMPA or of aircraft not used by licensed air carriers, references to Part-CAO organisations are added and references to Subpart F maintenance organisations are maintained (to allow for a smooth transition to Part-CAO, Subpart F will be maintained during the transition period). • Point (e) is added to include a requirement for human factors principles and human performance limitations to be taken into account for any continuing airworthiness management tasks.
M.A.710 – Airworthiness review	CAMO.A.320 – Airworthiness review	<p>In case of non-compliance with CAMO.A.320, an oversight finding should be raised and managed i.a.w. CAMO.B.350</p> <p>The text of existing M.A.710 is replaced with a requirement to follow either Part-M Section A point M.A.901 or Part-ML Section A point ML.903, depending on the aircraft managed. The specific elements constituting the airworthiness review process are transferred to those Part-M and Part-ML IRs.</p>
M.A.709 – Documentation	CAMO.A.325 – Continuing airworthiness management data	<p>In case of non-compliance with CAMO.A.325, an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p> <p>CAMO.A.325 Continuing airworthiness management data is changed for consistency to reflect the scope of the new Part-CAMO and to update the relevant cross references. Point (b) is deleted as the requirement to produce baseline or generic maintenance programmes is not maintained.</p>