

**Considering Changes introduced by COMMISSION
IMPLEMENTING REGULATION (EU) 2019/1383 of 8 July 2019
amending and correcting Regulation (EU) No 1321/2014**

as regards to safety management systems in continuing airworthiness
management organisations and alleviations for general aviation aircraft concerning
maintenance and continuing airworthiness management

Sofema Aviation Services www.sassofia.com considers the new regulation.

Subjects Covered

Related to Commission Regulation (EU) No 1321/2014 & the introduction of
simplified Continuous Airworthiness (CAW) requirements corresponding to the
lower risks associated with light aircraft in general aviation, which is not listed in the
air operator certificate of an air carrier.

Related to Aircraft Maintenance Programmes (AMP) airworthiness reviews and
deferment of defects.

As a consequence, a new organisation approval with less stringent requirements
and combined privileges for maintenance, continuing airworthiness management
and for airworthiness reviews and permits to fly should be introduced. (Contracting
to Part 145 is allowed.)

Safety Risk Management within the CAMO

The CAMO has a responsibility as part of the operators AOC to manage Safety in
accordance with 965 /2012. (and ultimately ICAO annex 19 – authors note!)

Subpart G of Annex I does not currently contain any requirements for safety risk
management within the CAMO.

Therefore, a management system of CAMOs, including safety risk management for
organisations that manage the continuing airworthiness of aircraft used by AOC
holders, should be introduced.

***Note – there is nothing new here and this obligation has been visible in ICAO
since Jan 2009 and visible in EASA since the issue of 965/2012.***

That management system should apply to all CAMOs that manage the continuing
airworthiness.

Sufficient transition period should be provided for organisations involved in the continuing airworthiness of aircraft and components to ensure compliance with new rules and procedures introduced by this Regulation.

Note EASA does not state the transition nor provide guidance in the way that was originally provided by NPA 2013- 01 (over 6 years ago).

Never make the mistake of treating EASA compliance as a destination, it is a step on the journey!

Alleviation

In order to ensure proportionate rules for aircraft other than complex motor-powered aircraft and not listed in the air operator certificate of an air carrier, licensed in accordance with Regulation (EC) No 1008/2008, safety management principles should not apply to combined airworthiness organisations.

It is also appropriate to align the requirements for the competent authorities with the developments of safety management concepts by the International Civil Aviation Organisation, in particular as regards the introduction of the authority management system, as well as the implementation of the state safety programme and ensuring coordination between authorities.

A wrong airworthiness assessment of the aircraft due to incomplete continuing airworthiness records can pose a risk to flight safety. Therefore, the existing rules related to continuing airworthiness records should be amended.

Final Note – It appears that EASA has issued a regulation which is telling itself to issue requirements related to SMS in a Part M CAMO.

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