

What's New In EASA Part M and what does it mean for CAMO's Operators & Maintainers?

(EU) Decision 2016/011/R amending Amendments to the Acceptable Means of Compliance and Guidance Material to Commission Regulation (EU) No 1321/2014

The new requirements are applicable from 25 August 2016

They follow on from the issue of EU Regulation 2015/1536

Significant changes include the alignment between the Part M and Part 145 regarding the nature of Critical Tasks and the Performance of Independent inspections

In addition the relationship between the Part M and CAMO is qualified by the following

'GM 145.A.65(b)(1) Safety and quality policy, maintenance procedures and quality system Appendix XI to AMC M.A.708(c) provides guidance on the elements that need to be considered for the maintenance contract between the CAMO and the maintenance organisation. The Part-145 organisation should take into account these elements to ensure that a clear contract or work order has been concluded before providing maintenance services.'

This Decision ((EU) Decision 2016/011/R) introduces amendments to the AMC and GM to Part-M, Part-145 and Part-66, and establishes a new annex containing the AMC/GM to Part-T.

The amendments to the AMC/GM are annexed to ED Decision 2016/011/R as follows:

- Annex I contains the amendments to Annex I (AMC/GM to Part-M) to Decision 2015/029/R,
- Annex II contains the amendments to Annex II (AMC/GM to Part-145) to Decision 2015/029/R,
- Annex III contains the amendments to Annex III (AMC/GM to Part-66) to Decision 2015/029/R,
- and
- Annex IV contains a new Annex V (AMC/GM to Part-T) to Decision 2015/029/R.

Essentially the requirement's focus on the following areas

'Aircraft Continuing Airworthiness Monitoring' (ACAM)

Competent authorities are required to develop a survey programme to monitor the airworthiness status of the fleet of aircraft on their register, referred to as 'Aircraft Continuing Airworthiness Monitoring' (ACAM, cf. M.B.303). The survey programme shall be developed by selecting a relevant sample of aircraft and shall include an aircraft survey, focusing on a number of key risk elements.

ACAM: the aim is to improve clarity and consistency of the implementation of the ACAM requirements and key risk elements; focus on more flexible, risk-based

planning of inspections; and provide the possibility to conduct combined surveys and clarify the scope and the different types of surveys.

Additional AMC and GM which focus on more flexible, risk-based planning of inspections, the possibility to conduct combined surveys, clarification of the scope and different types of surveys and in particular provide detailed guidance on key risk elements to be used for the ACAM inspections.

SAS Note - General Question to ask how is this element working for you currently ? (ACAM)

Has your regulatory spoken to you about this ?

Critical maintenance tasks' (See - What's New in Part M – Considering Critical Tasks)

Critical tasks: the aim is to mitigate the risks associated to the performance of maintenance by clarifying the requirements for the identification of critical maintenance tasks and the need to implement measures necessary to detect errors made when performing those tasks.

'Alignment of Commission Regulation (EC) No 2042/2003 with Regulation (EC) No 216/2008 and with ICAO Annex 6 requirement for human factor principles to be observed in the design and application of the aircraft maintenance programme'

SAS Note That there is still no requirement for HF training for CAMO staff – what is your organisational position on this ?

Introduction of the use of the term Air Carrier but note responsibility remains the same

'AMC M.A.201(e)(2) Responsibilities

1. An air carrier licensed in accordance with Regulation (EC) No 1008/2008 only needs to hold a CAMO approval as part of its air operator certificate (AOC) for the management of the continuing airworthiness of the aircraft listed on its AOC. The approval to carry out airworthiness reviews is optional.

2. Part-M does not provide for CAMOs to be independently approved to perform continuing airworthiness management tasks on behalf of air carriers licensed in accordance with Regulation (EC) No 1008/2008. The approval of such activity is vested in the (AOC).

3. The operator is ultimately responsible and, therefore, accountable for the airworthiness of its aircraft.'

Part T relates to the definition of the continuing airworthiness requirements applicable to third-country registered aircraft dry leased-in by EU licensed air carriers.