

## **Continuing Airworthiness Responsibilities (for Commercial SPOs)**

Sofema Aviation Services ([www.sassofia.com](http://www.sassofia.com)) Considers obligations related to Commercial SPO operations.

### **Introduction**

EASA Air Operations Regulation (EU) No 965/2012 Part-SPO (Specialised Operations) applies to any aircraft operation, other than commercial air transport, where the aircraft is used for specialised activities such as agriculture, construction, photography, surveying, observation, patrol and aerial advertisement.

Operators engaged in commercial specialised operations or engaged in non-commercial specialised operations using a complex motor-powered aircraft must submit a declaration regarding their operation.

In addition, a commercial operator conducting a high-risk specialised operation must also apply for and obtain an authorisation.

The declaration and authorisation will help to establish and maintain the required oversight programme for Part-SPO aircraft.

Note - The programme will be developed based on the nature and complexity of each operation using available data, including that from any past oversight activities.

### **ORO.SPO.100** Common requirements for commercial specialised operators

(a) A commercial specialised operator shall in addition to ORO.DEC.100 also comply with ORO.AOC.135, OROAOC.140 and ORO.AOC.150.

### **ORO.AOC.135** Personnel Requirements

(a) In accordance with ORO.GEN.210(b), the operator shall nominate persons responsible for the management and supervision of the following areas:

- (1) flight operations;
- (2) crew training;
- (3) ground operations; and
- (4) continuing airworthiness in accordance with Regulation (EC) No 2042/2003. (Repealed by 1321/2014)

**ORO.GEN.210(b)** requires that these persons are ultimately responsible to the accountable manager.

### **GM2 ORO.SP0.100(a)** Personnel requirements COMPETENCE OF NOMINATED PERSONS

(f) Continuing airworthiness. The nominated person should have the relevant knowledge and appropriate experience requirements related to aircraft continuing airworthiness as detailed in Part-M.

In accordance with M.A.201(f)(2) and M.A.201(h)(2) (as amended by Regulation (EU) 2015/1536):

For aircraft used for commercial SPO, the continuing airworthiness must be managed by a CAMO.

If the operator is not CAMO approved itself, then the operator shall establish a written contract with a CAMO.

The contract shall comply with Appendix I to Part-M.

This contract contains the following (among other aspects):

Section 5.1: Obligations of the CAMO.

Section 5.2: Obligations of the owner/operator.

As a consequence, somebody in the operator must be responsible for the obligations in Section 5.2.

This is the person required by ORO.A0C.135(a)(4) and must be nominated by the operator

Note - this is not a "Camo Post-Holder – (this responsibility cannot be transferred to the CAMO).

### **Contracted CAMO Responsibilities**

The contracted CAMO will be responsible for the obligations in Section 5.1.

This CAMO has its own nominated persons and its own quality system.

Note 1 - These tasks are not the responsibility of the operator.

Note 2 – Concerning CAMO - Qualifications: Part-M only contains the qualification requirements for the personnel of the CAMO (refer to M.A.706)

It does not contain qualification requirements for the person nominated by the operator to ensure compliance with the obligations of Section 5.2 of the contract.

### **Obligations Contained in the Contract between Operator and CAMO**

#### **5.1. Obligations of the CAMO:**

1. have the aircraft type in the scope of its approval;
2. respect the conditions to maintain the continuing airworthiness of the aircraft listed below:

(a) develop a maintenance programme for the aircraft, including any reliability programme developed, if applicable;

- (b) Not Applicable to commercial SPOs
- (c) organise the approval of the aircraft's maintenance programme;
- (d) once approved, give a copy of the aircraft's maintenance programme to the owner/operator;
- (e) organise a bridging inspection with the aircraft's prior maintenance programme;
- (f) organise for all maintenance to be carried out by an approved maintenance organisation;
- (g) organise for all applicable airworthiness directives to be applied;
- (h) organise for all defects discovered during scheduled maintenance, airworthiness reviews or reported by the owner to be corrected by an approved maintenance organisation, coordinate scheduled maintenance, the application of airworthiness directives, the replacement of life limited parts, and component inspection requirements;
- (i) inform the owner each time the aircraft shall be brought to an approved maintenance organisation;
- (j) manage all technical records;
- (k) archive all technical records;

**Continuation (Obligations of the CAMO):**

- 3. Organise the approval of any modification to the aircraft in accordance with Part-21 before it is embodied;
- 4. organise the approval of any repair to the aircraft in accordance with Part-21 before it is carried out;
- 5. inform the competent authority of the member State of registry whenever the aircraft is not presented to the approved maintenance organisation by the owner as requested by the approved organisation;
- 6. inform the competent authority of the Member State of registry whenever the present contract has not been respected;
- 7. ensure that the airworthiness review of the aircraft is carried out when necessary and ensure that the airworthiness review certificate is issued or a recommendation is sent to the competent authority of the Member State of registry;
- 8. send within 10 days a copy of any airworthiness review certificate issued or extended to the competent authority of the Member State of registry;
- 9. carry out all occurrence reporting mandated by applicable regulations;

10. inform the competent authority of the Member State of registry whenever the present contract is denounced by either party.

## **5.2. Obligations of the owner/operator**

1. have a general understanding of the approved maintenance programme;
2. have a general understanding of this Annex (Part-M);
3. present the aircraft to the approved maintenance organisation agreed with the CAMO at the due time designated by the CAMO's request;
4. not modify the aircraft without first consulting the CAMO;
5. inform the CAMO of all maintenance exceptionally carried out without the knowledge and control of the CAMO;
6. report to the CAMO through the logbook all defects found during operations;
7. inform the competent authority of the Member State of registry whenever the present contract is denounced by either party;
8. inform the CAMO and competent authority of the Member State of registry whenever the aircraft is sold;
9. carry out all occurrence reporting mandated by applicable regulations;
10. inform on a regular basis the CAMO about the aircraft flying hours and any other utilisation data, as agreed with the CAMO;

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