

Implementing SMS into Part-M (Annex Vc) Part-CAMO Continuing Airworthiness Management of Aircraft

[Sofema Aviation Services](#) looks at the fundamental changes coming to Part M.

Introduction

EASA has issued Regulation (EU) 2019/1383 published post Opinion 06/2016. This regulation identifies how Safety Management (SMS) is to be introduced into the Part M requirements.

EASA expects that the proposed changes will:

- Increase the level of safety in continuing airworthiness management and maintenance of aircraft operated by licensed air carriers and of CMPA (complex motor-powered aircraft) and
- Facilitate the implementation of single management systems by multiple-approved organisations and streamline the related oversight.

What are the implications of this regulatory change for your organisation?

The following elements should be considered in relation to SMS in an EASA Part M Organisation:

- a) Regulatory Compliance
- b) Human Error & Error Management
- c) Compliance Monitoring
- d) Safety Risk Management
- e) Safety Culture

According to EASA, this regulatory change is ultimately designed to create a harmonised approach to the implementation of the new management system requirements for all Continuing Airworthiness Management Organisations (CAMOs), ensuring effective compliance monitoring, safety risk management and oversight for all continuing airworthiness management activities.

To promote the best possible approach to Safety CAMOs will need to be able to demonstrate their understanding of the differences between regulatory-driven compliance management and effective aviation safety risk and at the same time taking into consideration both human and human performance.

Considering the changes affecting SMS in a Part-M

Following Comment Response Documents [2013-01\(A\)](#) & [2013-01\(B\)](#) (which essentially stalled) EASA published an [Opinion 2016-06](#) relating to introducing SMS into Part-M.

Regulation (EU) 2019/1383 was published to introduce changes to the Continuing Airworthiness Regulation, including Annex Vc – ‘Part-CAMO’.

Note - Part -CAMO is dedicated to CAMOs which are managing aircraft operated by licensed air carriers and/or CMPA.

Only Part-CAMO organisations managing AOC operations will be required to implement SMS based on a set of proportional management system requirements.

The new Annex Vc ‘Part-CAMO’ supersedes the current Subpart G of Annex I (Part-M).

The changes introduced are substantially aligned with the authority and organisation requirements adopted in the other EASA domains.

Pursuant to Commission Regulation (EU) No 965/2012, holders of an air operator certificate (‘AOC’) are currently required to have a management system in place, including safety risk management of their activities.

One of such activities is the continuing airworthiness management of their aircraft fleet, which is carried out by their own continuing airworthiness management organisation (‘CAMO’), approved in accordance with Subpart G of Annex I to Regulation (EU) No 1321/2014.

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

Note 1 – 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 2 – 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. (Part CAO).

EASA further advises 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.

EASA further expresses concern – 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.

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