

What Does EASA Expect within a Compliance monitoring which covers EASA Part CAMO

This document considers the roles and responsibilities within the CAMO environment. Please note that when EASA refers to a management system it covers both safety and compliance systems.

CAMO.A.200 Management system

(a) The organisation shall establish, implement, and maintain a management system that includes:

- (1) clearly defined lines of responsibility and accountability throughout the organisation, including a direct safety accountability of the accountable manager;
- (2) a description of the overall philosophies and principles of the organisation with regard to safety, referred to as the safety policy;
- (3) the identification of aviation safety hazards entailed by the activities of the organisation, their evaluation and the management of associated risks, including taking actions to mitigate the risks and verify their effectiveness;
- (4) maintaining personnel trained and competent to perform their tasks;
- (5) documentation of all management system key processes, including a process for making personnel aware of their responsibilities and the procedure for amending this documentation;
- (6) a function to monitor compliance of the organisation with the relevant requirements. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary;
- (7) any additional requirements that are laid down in this Regulation.

(b) The management system shall correspond to the size of the organisation and the nature and complexity of its activities, taking into account the hazards and associated risks inherent in these activities.

AMC 1 CAMO.A.200(a)(6)

COMPLIANCE MONITORING —General

- (a) The primary objectives of compliance monitoring are to provide an independent monitoring function on how the organisation ensures compliance with the applicable requirements, policies and procedures, and to request action where non-compliances are identified.
- (b) The independence of the compliance monitoring should be established by always

ensuring that audits and inspections are carried out by personnel who are not responsible for the functions, procedures or products that are audited or inspected.

Consider that there is a difference between the term monitoring and auditing – monitoring implies an ongoing oversight of a given process and auditing is a “sample” measured against a set of criteria or a standard.

(a) An essential element of compliance monitoring is the independent audit.

(b) The independent audit should be an objective process of routine sample checks of all aspects of the CAMO's ability to carry out continuing airworthiness management to the standards required by this Regulation. It should include some product sampling as this is the end result of the process.

(c) The independent audit should provide an objective overview of the complete set of continuing airworthiness management-related activities.

(d) The organisation should establish an audit plan to show when and how often the activities as required by Part-M, Part-ML, and Part-CAMO will be audited.

- The audit plan should ensure that all aspects of Part-CAMO compliance are verified every year, including all the subcontracted activities, and the auditing may be carried out as a complete single exercise or subdivided over the annual period.
- The independent audit should not require each procedure to be verified against each product line when it can be shown that the particular procedure is common to more than one product line and the procedure has been verified every year without resultant findings.
- Where findings have been identified, the particular procedure should be verified against other product lines until the findings have been closed, after which the independent audit procedure may revert to a yearly interval for the particular procedure.
- Provided that there are no safety-related findings, the audit planning cycle specified in this AMC may be increased by up to 100%, subject to a risk assessment and/or mitigation actions, and agreement by the competent authority.

(e) Where the organisation has more than one approved location, the audit plan should ensure that each location is audited every year or at an interval determined through a risk assessment agreed by the competent authority and not exceeding the applicable audit planning cycle.

(f) A report should be issued each time an audit is carried out describing what was checked and the resulting non-compliance findings against applicable requirements and procedures.

AMC3 CAMO.A.200(a)(6) Management System

COMPLIANCE MONITORING — CONTRACTING OF THE INDEPENDENT AUDIT

(a) If external personnel are used to perform independent audits:

- Any such audits are performed under the responsibility of the compliance monitoring manager.
- The organisation remains responsible for ensuring that the external personnel have the relevant knowledge, background, and experience that are appropriate to the activities being audited, including knowledge and experience in compliance monitoring.

(b) The organisation retains the ultimate responsibility for the effectiveness of the compliance monitoring function, in particular for the effective implementation and follow-up of all corrective actions.

AMC4 CAMO.A.200(a)(6) Management System

COMPLIANCE MONITORING — FEEDBACK SYSTEM

(a) An essential element of compliance monitoring is the feedback system.

(b) The feedback system should not be contracted to external persons or organisations.

- When a non-compliance is found, the compliance monitoring function should ensure that the root cause(s) and contributing factor(s) are identified (see GM1 CAMO.A.150), and that corrective actions are defined.
- The feedback part of the compliance monitoring function should define who is required to address any non-compliance in each particular case, and the procedure to be followed if the corrective action is not completed within the defined time frame.
- The principal functions of the feedback system are to ensure that all findings resulting from the independent audits of the organisation are properly investigated and corrected in a timely manner, and to enable the accountable manager to be kept informed of any safety issues and the extent of compliance with Part-CAMO.

(c) The independent audit reports referred to in AMC2 CAMO.A.200(a)(6) should be sent to the relevant department(s) for corrective action, giving target closure dates.

- These target dates should be discussed with the relevant department(s) before the compliance monitoring function confirms the dates in the report.
- The relevant department(s) are required to implement the corrective action and inform the compliance monitoring function of the status of the implementation of the action.

(d) Unless the review of the results from compliance monitoring is the responsibility of the safety review board (ref. AMC1 CAMO.A.200(a)(1) point (b)(4)), the accountable manager should hold regular meetings with staff to check the progress of any corrective actions.

- These meetings may be delegated to the compliance monitoring manager on a day-to-day basis, provided that the accountable manager:
 - Meets the senior staff involved at least twice per year to review the overall performance of the compliance monitoring function.
 - Receives at least a half-yearly summary report on non-compliance findings.

(e) All records pertaining to the independent audit and the feedback system should be retained for the period specified in point CAMO.A.220(b) or for such periods as to support changes to the audit planning cycle in accordance with AMC2 CAMO.A.200(a)(6), whichever is longer.

This framework ensures robust compliance monitoring within CAMOs, integrating regular audits, corrective feedback, and rigorous record-keeping to maintain airworthiness and adherence to Part-CAMO regulations.