Role of EASA Competent Authority in Initial Certification

The role of the Competent Authority in initial certification under the EASA MSAT framework applies across multiple domains.

Purpose and Legal Obligation

Before granting initial certification or approval, the **Competent Authority (CA)** must, in line with its "B" regulations:

1. Verify that the Management System (MS), incorporating Safety Management System (SMS) and Compliance Monitoring, is:
    - Present – Documented and defined.
    - Suitable – Tailored to the size, nature, and complexity of operations.
2. Ensure all required enablers (procedures, personnel, resources, safety policy) are in place before operations commence.
3. Apply a performance-based approach even at initial certification, in line with EASA MSAT guidance.

- **Operators, Airports, CAMOs, and AMOs**
    - Core oversight principles remain consistent, with domain-specific focus areas.

Purpose of Initial Certification Oversight

The Competent Authority (CA) is responsible for ensuring that, before an organisation begins operations, its Management System (MS) incorporating the Safety Management System (SMS) and Compliance Monitoring is:

- Present: All required processes and structures exist.
- Suitable: The MS is tailored to the organisation's size, complexity, and operational context.

This ensures that the "enablers" for safe, compliant operations are in place at the start of activity. Much of this can be verified via desktop review of manuals (OMM, CAME, MOE, ADR manuals, etc.) before visiting the premises to validate implementation readiness.

Purpose of Initial Certification Oversight – Detailed Discussion

The Competent Authority (CA) plays a critical gatekeeping role before any aviation organisation whether an operator, aerodrome, CAMO, or AMO can commence operations.

The initial certification oversight process is the first formal opportunity for the CA to ensure that the organisation has a functioning and fit-for-purpose Management System (MS) in place. This MS must include the Safety Management System (SMS) and Compliance Monitoring Function (CMF) as required under applicable EASA domain regulations.

The primary objectives of this oversight phase are to verify that the MS is both present and suitable at the outset, forming the foundation for safe, compliant, and performance-oriented operations.

Present – Evidence of Complete MS Documentation and Structure

Being "Present" means that all mandated processes, structures, and roles are formally documented and assigned in accordance with the relevant regulations:

- Safety Policy & Objectives
- Accountable Manager appointment with defined authority and resources
- Defined lines of safety accountability across the organisation
- Compliance Monitoring Programme established with scope, methodology, and resourcing in line with AMC/GM guidance.
- Emergency Response Planning coordinated with internal and external stakeholders (ERP chapters in OMM, CAME, MOE, ADR manuals).

At this stage, the CA will typically conduct a desktop review of all core exposition documents—such as the Operations Manual (OMM), Continuing Airworthiness Management Exposition (CAME), Maintenance Organisation Exposition (MOE), or Aerodrome Manual—to confirm that each required MS component is present.

Suitable – MS Design Fit for the Organisation's Context

Suitability goes beyond mere documentation—it assesses whether the MS has been adapted to the organisation's operational realities. This includes its size, complexity, nature of activities, interfaces, and risk profile.

Key suitability considerations:

- **Scalability**: MS complexity matches operational scale
- **Risk Focus**: The MS addresses the most significant hazards inherent to the organisation's operations.
- **Resource Adequacy**: Staff, finances, tools, and infrastructure align with safety-critical activities (e.g., AMC1 145.A.30(d) for "sufficient number of personnel").
- **Interface Management**: Documented processes exist for safety-critical interfaces (e.g., Operator–CAMO, CAMO–AMO, Airport–ATC).
- **Cultural Fit**: Safety policy and just culture provisions are embedded in the organisation's culture from the outset.

Verification Process – Desktop Review to On-Site Validation

While much of the "Present" and some of the "Suitable" criteria can be confirmed via desktop review, the CA should also:

- Conduct on-site inspections before granting approval to assess physical readiness, workplace safety culture indicators, and interface arrangements.
- Verify training records and competence management systems to ensure personnel can operate the MS from day one.
- Assess ERP integration with external stakeholders through evidence of drills, table-top exercises, or formal coordination agreements.

Domain-Specific Focus Operators (Air Carriers – ORO.GEN.200 & associated AMCs)

- The CA verifies the integration of SMS into operational processes, ensuring key managers (including the Accountable Manager) understand their responsibilities.
- Checks readiness for hazard identification, safety reporting, and just culture before operational flights.
- For complex operators, alignment with contracted CAMO(s) is assessed, especially if continuing airworthiness is outsourced.

Verifying SMS Integration into Operational Processes

The Competent Authority (CA) must confirm that the Safety Management System (SMS) is fully embedded into the operator's core operational workflows, not just maintained as a standalone manual or policy.

CA Actions at Initial Certification:

- Document Review:
    - Evaluate the Operations Manual (OM), Safety Management Manual, and associated procedures to ensure SMS processes (hazard identification, risk assessment, safety assurance) are integrated into operational decision-making.
- Interviews: Speak with the Accountable Manager and nominated persons (e.g., NP Flight Ops, NP Ground Ops)
    - To verify understanding of their SMS roles, decision-making authority, and resource allocation responsibilities.
- Observation: Check that operational planning, dispatch, crew scheduling, training, and maintenance coordination processes incorporate SMS triggers (e.g., risk assessments before introducing new routes or aircraft types).

Readiness for Hazard Identification, Safety Reporting, and Just Culture

The CA must ensure that key SMS enablers are functioning before the first flight. These enablers allow early identification of safety issues and foster open reporting.

CA Verification Points:

- **Hazard Identification**: Confirm that processes are defined and understood by operational personnel—e.g., how hazards during flight planning or turnaround are detected, assessed, and escalated.
- **Safety Reporting Scheme**: Verify compliance with Regulation (EU) 376/2014 on occurrence reporting, including the ability to capture voluntary reports and feedback loops to staff.
- **Just Culture**: Ensure that the operator's policies clearly define acceptable and unacceptable behaviours, outline protection for reporters, and are endorsed visibly by management (AMC1 ORO.GEN.200(a)(2)(a)(4)).

- **Testing**: CA can review results of safety surveys, reporting statistics from pre-ops training, or mock occurrence reporting drills.

Alignment with Contracted CAMO(s) in Complex Operator Setups

For complex air carriers—especially those outsourcing continuing airworthiness to a contracted CAMO—the CA must assess whether the operator's MS and CAMO's MS are aligned and integrated.

Key Oversight Areas:

- Contractual Clarity: Review the operator–CAMO agreement to confirm allocation of responsibilities, escalation paths, and data exchange requirements in accordance with CAMO.A.125 and CAMO.A.200(e).
- Interface Management: Verify procedures for hazard/risk sharing, occurrence reporting, and safety action follow-up between the two entities.
- Performance Monitoring: Ensure the operator can monitor the CAMO's continuing airworthiness performance, including compliance with Part-M and Part-CAMO requirements.
- Mutual Awareness: Check that CAMO personnel are familiar with the operator's safety objectives and vice versa—especially in relation to MEL management, defect control, and airworthiness review processes.

Aerodrome Operators

- The CA ensures the aerodrome MS covers operational safety risks, runway safety, wildlife hazard management, and coordination with airlines, ATC, and emergency services.
- Coordination with external stakeholders' emergency response plans (ERP) is a specific focus, with interoperability checks before certification.

Ensuring the Aerodrome MS Covers Operational Safety Risks

The Competent Authority (CA) must verify that the aerodrome's Management System (MS) is structured to address all operational safety hazards relevant to its scope and

environment. This includes the integration of an SMS in line with ICAO Annex 14, Annex 19, and EU regulations.

CA Verification Actions:

- **Document Review**: Assess the Aerodrome Manual and Safety Management Manual to confirm hazard identification and risk management processes are present for:
    - Runway safety (incursions, excursions, FOD).
    - Wildlife hazard management.
    - Apron and ground handling safety oversight.
    - Airside works and temporary hazard controls.
    - Weather-related hazards (low visibility, winter operations).
- **Risk Register Evaluation**: Ensure the MS includes an aerodrome-specific risk register prioritising operational safety risks, with associated mitigation strategies and performance indicators.
- **Stakeholder Integration**: Confirm that airlines, ATC, ground handlers, and emergency services are included in hazard reporting and safety performance monitoring processes.

Runway Safety and Wildlife Hazard Management Readiness

Runway safety and wildlife hazard control are core safety priorities for aerodromes

CA Checks Before Certification:

- Runway Safety Programme: Ensure a documented programme exists, integrated into the MS, with defined roles, inspection frequencies, and incident reporting processes.
- Wildlife Hazard Management Plan: Confirm presence of a risk-based plan, staff training records, and wildlife hazard monitoring logs.
- Interface with ATC: Verify joint runway safety meetings, data sharing on incursions, and coordination during low-visibility operations.

Coordination with External Stakeholders' Emergency Response Plans (ERP)

The aerodrome shall maintain and coordinate an Emergency Response Plan (ERP) that is compatible with the plans of other relevant organisations.

CA Verification Points:

- ERP Documentation: Review the aerodrome's ERP to ensure alignment with ICAO Doc 9859 guidance and ADR AMC requirements.
- Interoperability: Confirm that airline operators, ATC, rescue and firefighting services, security providers, and local authorities have interlinked ERP procedures.
- Testing: Require evidence of ERP drills, table-top exercises, or full-scale simulations that validate communication protocols and operational coordination.
- Roles & Responsibilities: Verify that responsibilities for emergency command, information dissemination, and resource deployment are clearly defined across organisations.

CAMOs

The CA verifies that continuing airworthiness management processes, including airworthiness review, defect control, and interface management with operators and maintenance organisations, are documented and functional.

- Where multiple operators use the same CAMO, the CA assesses harmonisation of management systems and contractual arrangements.

Verifying Continuing Airworthiness Management Processes

The Competent Authority (CA) must ensure that all critical continuing airworthiness functions are not only documented but also ready to operate from the start of approval.
CA Verification Actions:

- Airworthiness Review Capability: Confirm that the CAMO has procedures for conducting Airworthiness Review Certificates (ARC) and that nominated ARC staff meet the qualification requirements.

- Defect Control Process: Evaluate the defect reporting, categorisation, and rectification tracking systems, ensuring integration with the operator's operational control centre and Part-145 AMOs.

- Maintenance Programme Management: Verify processes for developing, amending, and controlling approved maintenance programmes in accordance with Part-M / Part-CAMO.

- Reliability and Technical Log Management: Confirm that data capture and analysis processes are in place for reliability programmes, minimum equipment list (MEL) coordination, and technical log updates.

- Change Management: Review procedures for incorporating manufacturer instructions, airworthiness directives (ADs), and regulatory changes into the continuing airworthiness plan.

Interface Management with Operators and Maintenance Organisations

Effective interface management is critical for safety and regulatory compliance, particularly when different organisations handle airworthiness, operations, and maintenance.

CA Checks Before Certification:

- Operator–CAMO Agreement: Review contractual arrangements to confirm clarity of responsibilities including airworthiness data flow, defect reporting timelines, and escalation paths.

- CAMO–AMO Interface: Verify processes for work scope definition, maintenance release acceptance, and feedback from maintenance findings.

- Safety & Compliance Integration: Ensure that SMS processes for hazard reporting, occurrence management, and risk assessment are aligned across CAMO, operator, and AMO systems.

- Record Sharing & IT Systems: Confirm compatibility of record-keeping systems for technical logs, component histories, and AD/SB status reports.

Oversight of CAMOs Serving Multiple Operators

Where a CAMO supports multiple AOC holders or aircraft owners, the CA must ensure harmonisation of management systems and contractual obligations.

Key Oversight Areas:

- Management System Harmonisation: Verify that the CAMO's MS can accommodate the safety objectives, reporting procedures, and performance indicators of all clients without conflict.
- Workload and Resourcing: Check that staffing levels, qualifications, and infrastructure are adequate to serve multiple operators simultaneously
- Customisation of Processes: Ensure that maintenance programme development, reliability monitoring, and MEL management are tailored to each operator's operational profile while remaining consistent within the CAMO's system.
- Contractual Control: Review all contracts to confirm they contain clear terms for safety reporting, compliance monitoring, and performance review.

AMOs The CA ensures maintenance procedures, occurrence reporting, and competency assessment processes are in place.

- Confirms the Maintenance Organisation Exposition (MOE) reflects actual processes and that safety and compliance monitoring are embedded.
- Interfaces with contracted maintenance providers are reviewed for safety risk management alignment.

Ensuring Maintenance Procedures, Occurrence Reporting, and Competency Assessment

The Competent Authority (CA) must verify that the AMO has documented, functional, and resourced systems to maintain aircraft and components in compliance with Part-145 requirements.

CA Verification Actions:

- Maintenance Procedures: Review the MOE and associated procedures for performing, controlling, and certifying maintenance, including defect rectification, component overhaul, and critical maintenance task controls.
- Occurrence Reporting: Ensure the organisation has implemented an internal safety reporting system that complies with 145.A.202 and EU Reg. 376/2014, including clear channels for voluntary reporting, data analysis, and feedback to staff.

- Competency Assessment: Confirm that the AMO's personnel competency system meets AMC1 145.A.30(e) standards—covering qualification, experience, recurrent training, and human factors awareness.

- Human Factors & Safety Culture: Verify that human performance considerations are embedded into maintenance planning, shift handovers, and error-prevention practices.

Confirming the MOE Reflects Actual Processes and Embeds Safety & Compliance Monitoring

The Maintenance Organisation Exposition (MOE) must accurately describe the organisation's real operating methods and safety systems.

CA Checks Before Certification:

- **Document Alignment**: Cross-check that what is written in the MOE matches actual work practices observed during the on-site inspection.
- **Safety Management Integration**: Confirm that the organisation's SMS processes (hazard identification, risk assessment, safety performance monitoring) are integrated into maintenance procedures, not separate from daily operations.
- **Compliance Monitoring:** Review the compliance monitoring programme for scope, frequency, auditor competence, and follow-up actions (
- **Change Management**: Ensure processes exist for assessing and managing safety impacts of organisational, facility, or scope changes before they are implemented.

3. Reviewing Interfaces with Contracted Maintenance Providers for Safety Risk Management Alignment

Where an AMO uses **contracted organisations** (subcontractors or external specialists), the CA must ensure these interfaces are properly controlled to avoid safety gaps.

CA Verification Points:

- **Contractor Oversight**: Review the AMO's procedures for selecting, auditing, and monitoring contracted providers, ensuring compliance with 145.A.75(b) (subcontracting provisions).
- **Safety Information Exchange**: Verify that hazard reports, defect data, and quality findings are shared between the AMO and its contractors in a timely manner.
- **Control of Critical Maintenance**: Ensure the AMO retains responsibility for work scope definition, inspection points, and final certification, even if tasks are outsourced.

- **Compliance & SMS Alignment**: Confirm that contracted providers' safety and compliance monitoring arrangements are compatible with the AMO's own system.

Cross-Domain Competent Authority Actions in Initial Certification

For all domains, the CA should:

1. **Interview key staff** – Accountable Manager, Safety Manager, compliance personnel, operational supervisors.
2. **Verify documentation** – SMS Manual, Compliance Monitoring procedures, emergency response planning, training programmes.
3. **Check interface management** – between internal departments and with external organisations (e.g., Operator–CAMO, Airport–ATC).
4. **Assess readiness** – while not all elements (e.g., safety performance targets) can be fully demonstrated pre-operations, structures must be in place to enable them.
5. **Promote standardisation** – advise and guide during the initial phase to foster harmonised MS implementation across domains.

Key Outcome of Initial Certification

The initial certification process is not just a compliance check — it sets the foundation for performance-based oversight. The CA's role is to ensure organisations enter into service with:

- A functioning management system aligned to EASA requirements.
- Clear accountabilities and sufficient resources.
- Mechanisms for continuous improvement from day one.

Next Steps

See the following 2 day course available as Classroom or Webinar - Using The EASA Management System Assessment Tool (EASA MSAT) – 2 Days
https://sassofia.com/course/using-the-easa-management-system-assessment-tool-easa-msat-2-days/