



Responsibilities of CAMO and MO

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Ljubljana 6 December 2019

Questions

**Please feel free
to ask any question**



Accountability - M.A.201 Responsibilities

- ➔ The owner/operator is responsible for the continuing airworthiness of the aircraft
- ➔ Any person or organisation performing maintenance is responsible for the tasks performed



Accountability- M.A.201 Responsibilities

- ➔ Another way to put it is:
 - ➔ the owner/operator is responsible for the airworthiness condition of the aircraft and to plan and coordinate maintenance, and
 - ➔ the maintenance organisation is responsible for adequately performing and certifying the maintenance ordered by the operator

Simple, right?

Accountability - M.A.201 Responsibilities

- ➔ *M.A.201(a): The owner is responsible for the continuing airworthiness of an aircraft and shall ensure that no flight takes place unless:*
- 1. the aircraft is maintained in an airworthy condition, and; ...*

Accountability - M.A.201 Responsibilities

➔ What does "airworthy condition" mean?
Regulation (EU) No 1321/2014 Article 2(d)
defines:

“continuing airworthiness” means all of the processes ensuring that, at any time in its operating life, the aircraft complies with the airworthiness requirements in force and is in a condition for safe operation;

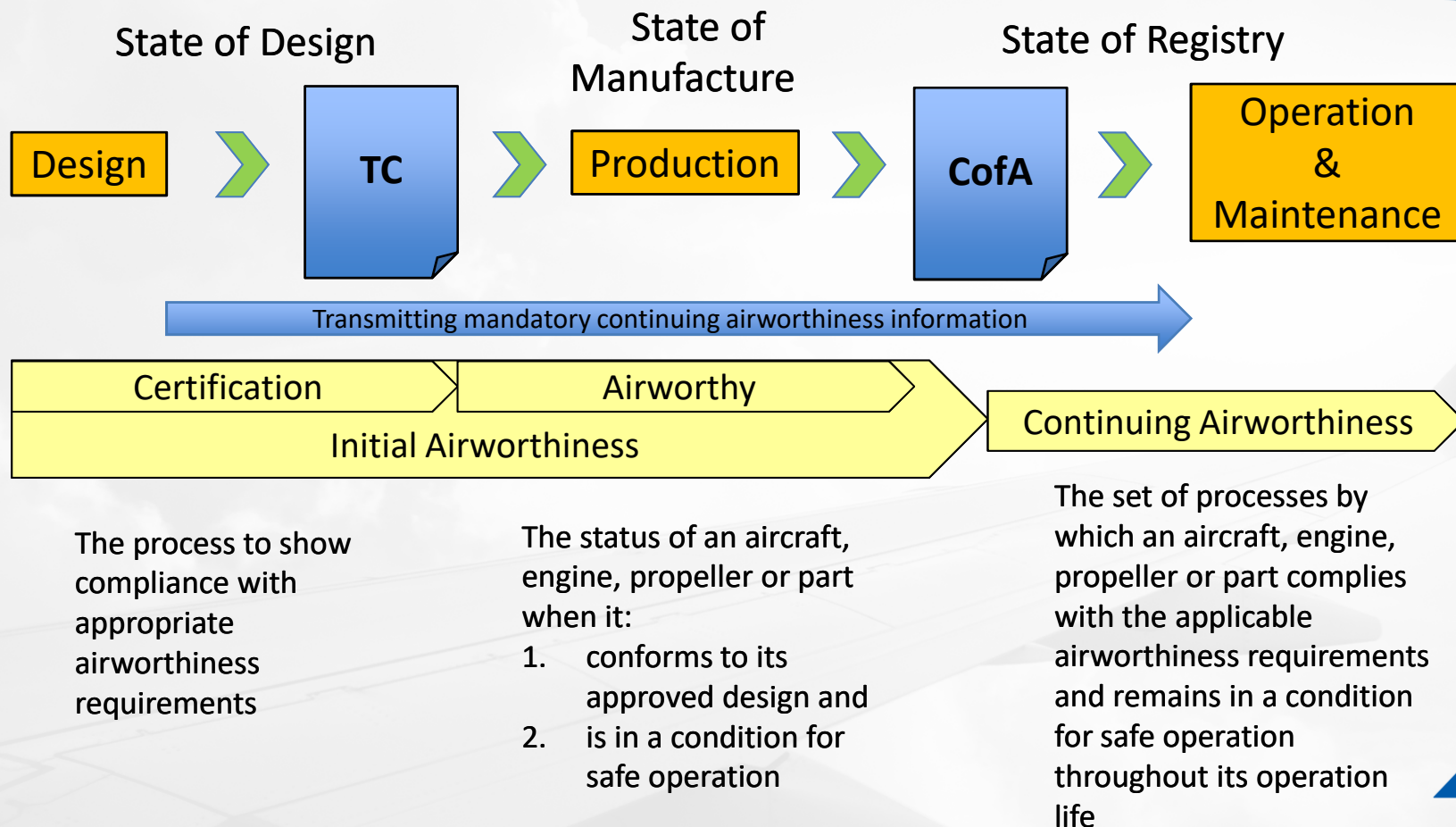
Point M.A.201(a) and M.A.902(b)

- ➔ Taking this definition, an aircraft is in an airworthy condition when:
 - ➔ the aircraft & component meet Part-M
 - ➔ operational & emergency equipment correctly installed and serviceable or clearly identified as unserviceable
 - ➔ the aircraft remain in conformity with the TC

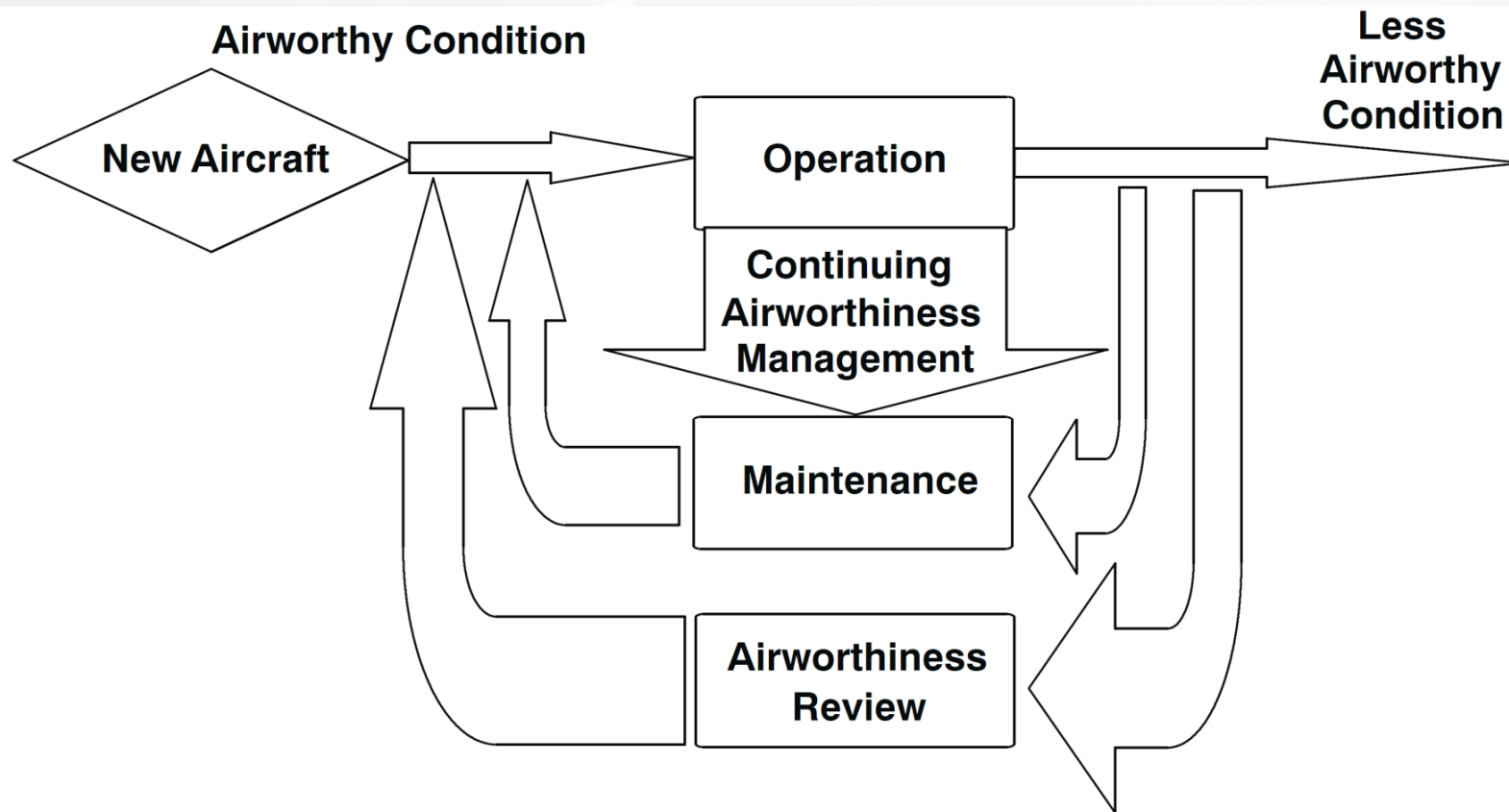
Point M.A.201(a) and M.A.902(b)

- ➔ the aircraft has not been operated beyond the limitations of the FM or the CofA
- ➔ the aircraft has not been involved in an accident or incident
- ➔ modifications and repairs as per Part-21
- ➔ and is in a condition for safe operation.

Summary of ICAO Annex 8



M.A.301 Continuing Airworthiness



CAMO responsibility

➔ The CAMO is responsible for determining:

➔ What maintenance is required

➔ When it has to be performed

➔ **By whom**

➔ To what standard (e.g. 145, MF, line, base, B1, B2, etc.)

in order to ensure the continued airworthiness
of the aircraft being operated

(GM M.A.708(b)(4))

M.A.201 Responsibilities

- ➔ The owner/operator is responsible for verifying that the MO is appropriately approved in terms of:
 - ➔ Specific type of aircraft and engine combination
 - ➔ Specific engine or component(s)
 - ➔ Scope of maintenance
 - ➔ Limitations (line, base, B1/B2, NDT, etc.)
 - ➔ Industrial capacity for the maintenance



M.A.201 Responsibilities

- ➔ In return, the MO is responsible for only accept work order that are within their scope of work, limitations and capacity
- ➔ It is a „shared“ responsibility



M.A.201 Responsibilities

- A certificate of release to service:
 - only certifies that the maintenance requested/ordered has been completed satisfactorily, in accordance with the applicable IRs and the MO approved procedures; and,
 - Does not necessarily meaning that the aircraft is ready for flight



M.A.201 Responsibilities

➔ The MO cannot issue a certificate of release to service in case of any known non-compliances which endanger flight safety

- ➔ significant cracking, deformation, corrosion or failure of primary structure, any evidence of burning, electrical arcing, significant hydraulic fluid or fuel leakage and any emergency system or total system failure
- ➔ An airworthiness directive overdue



Responsibilities - M.A.201, M.A.301, M.A.708

- ➔ The obligation of the owner/operator is to know the airworthiness status of the aircraft before each flight takes place and, in particular, the need to ensure that all the maintenance ordered has been released or properly deferred (including incomplete maintenance)
- ➔ The owner/operator must “accept” the CRS



Work order (145A.65(b)1, M.A.610, M.A.708(d))

- ➔ The MO is responsible to ensure that a clear work order or contract had been agreed between the organisation
- ➔ The owner/operator is responsible to clearly establish and specify the maintenance to be carried out

Work order

- A work order can be:
 - Individual work order on a formal document or form specifying the work to be carried out;
 - An entry in the aircraft logbook specifying the defect that need to be corrected
 - Maintenance contract

Work order

- ➔ MO is responsible to bring to the attention to the owner new defects and incomplete maintenance work order for the specific purposes of obtaining agreement to rectify such defects or completing the missing elements of the maintenance order.

Case study #1

- ➔ An operator has a maintenance contract for line maintenance. The MO does not complete one task that is due, of a scheduled maintenance check, releases the aircraft and the aircraft goes flying
- ➔ Question: Where does the responsibility lie?
- ➔ Explain the responsibilities

Case study #2

- ➔ A work order for a check does not include an applicable AD that is overdue
- ➔ Questions:
 - ➔ Can the MO still carry out the AD?
 - ➔ Can the MO issue CRS?

Case study #3

- ➔ MO install a component to an aircraft from its storage room that has an AD overdue
- ➔ Question: Where does the responsibility lie?
- ➔ Explain the responsibilities

AMC 145.A.50(e)2

- The aircraft operator is responsible for ensuring that all required maintenance has been carried out before flight and therefore 145.A.50(e) requires such operator to be informed in the case where full compliance with 145.A.50(a) cannot be achieved within the operator's limitations. If the operator agrees to the deferment of full compliance, then the certificate of release to service may be issued subject to details of the deferment, including the operator's authority, being endorsed on the certificate.
- Note: Whether or not the aircraft operator does have the authority to defer maintenance is an issue between the aircraft operator and the competent authority of the State of Registry or State of operator, as appropriate. In case of doubt concerning such a decision of the operator, the approved maintenance organisation should inform its competent authority on such doubt, before issuing the certificate of release to service. This will allow this competent authority to investigate the matter with the competent authority of the State of Registry or the State of the operator as appropriate.

NPA 2014-11 & 2014-27

- EASA has published NPA 2014-11 & -27 to address the release of maintenance, as well as those related to the functions and responsibilities of CAMOs and maintenance organisations. See the following links:
- 2014-11: http://hub.easa.europa.eu/crt/docs/viewnpa/id_260
- 2014-27: https://hub.easa.europa.eu/crt/docs/viewnpa/id_286
- See also: <https://www.easa.europa.eu/download/foreign-part-145-approval/Part-%20145%20CRS%20policy%20171215.pdf>

Thank you for your attention
Hvala za vašo pozornost
Kakšno vprašanje?

**ANY
QUESTIONS?**