

## GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO

### Foreword

Regulation (EU) 2019/1383 amending Regulation (EU) No 1321/2014 introduces a new structure and new types of organisations (Part-CAO and Part-CAMO) in the Continuing Airworthiness domain, as of 24 March 2020. **This guide offers the view of EASA** on the transition of existing continuing airworthiness organisations to the new Part-CAO and Part-CAMO organisation, based on Article 4 of Regulation (EU) 2019/1383. **This is not binding material.**

EASA reminds that this transition process will be under the oversight of the competent authority and that any particular case or situation should be discussed and agreed with the competent authority.

This guide also takes into account the amendments that are currently being introduced to amend and correct the Regulation No 1321/2014 as amended by Regulation (EU) 2019/1383 (agenda Item 10 of EASA Committee 23-24 Oct. 2019).

### I. Introduction

#### a. General

Regulation (EU) 2019/1383 amending Regulation (EU) No 1321/2014 becomes applicable on 24 March 2020. Thereby the structure of the regulation (EU) No 1321/2014 is modified as shown below:

Reference	Designation	Topic
Annex I	Part-M	Continuing airworthiness standards – other-than-‘light aircraft’
		Includes Subpart F and Subpart G organisation requirements, applicable only until 24-Sep-2021
Annex II	Part-145	Maintenance organisation (all types of aircraft types and operation)
Annex III	Part-66	Maintenance licensing
Annex IV	Part-147	Maintenance training organisation
Annex Va	Part-T	Requirements for 3rd country a/c dry leased by an AOC
Annex Vb	Part-ML	Continuing airworthiness standards – ‘light aircraft’
Annex Vc	Part-CAMO	Continuing airworthiness management organisation (all types of aircraft types and operation)
Annex Vd	Part-CAO	Combined (continuing airworthiness management and/or maintenance) organisation – non-complex aircraft and non-licenced air carrier

Note: the (unofficial) denomination ‘Light aircraft’ means the following non-complex motor-powered aircraft:

- aeroplanes up to 2730 Kg MTOM
- rotorcraft up to 1200 Kg MTOM / max 4 occupants
- other ELA2 aircraft.

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Part-M is also mandatory for aircraft used by an air carrier licenced in accordance with Reg. 1008/2008

As a consequence, from 24 March 2020, each aircraft must follow either Part-M or Part-ML standard and any person or organisation involved in continuing airworthiness must comply with Part-M, or Part-ML or both, depending on the scope of activities.

Regulation (EU) 1321/2014 does not introduce a 'Part-ML organisation' because Part-ML is only a standard for 'light aircraft'. However, all types of organisations provided for in this Regulation (Part-CAMO, Part-CAO, Part-145) may be involved in continuing airworthiness activities for aircraft following Part-ML.

The new organisations introduced by this amendment are **Part-CAO** organisations and **Part-CAMO** organisations.

- **Part-CAMO** provides requirements for Continuing Airworthiness Management Organisation (CAMO): compared with Part-M Subpart G organisation, the main difference is the introduction of SMS principles.
- **Part-CAO** provides a new set of requirements for Combined Airworthiness Organisation: such organisation may perform CAMO activities or Maintenance Organisation activities, or both, but limited to non-complex aircraft not used by a licenced air carrier.

These **Part-CAMO** and **Part-CAO** organisations are supposed to gradually replace Part-MF and Part-MG organisations. **After 24 September 2021, there should no more Part-M Subpart F (Part-MF) and Part-M Subpart G (Part-MG) organisations.** This is the reason why, to be able to continue their activities, the existing Part-MF and Part-MG organisations must eventually receive a new approval.

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### b. Transition

To facilitate the issue of new approval for existing organisation, Article 4 of Regulation (EU) 2019/1383 (amending Regulation (EU) No 1321/2014) offers the possibility for organisations with a valid Part-MF, Part-MG and Part-145 approval to make a transition to Part-CAO or Part-CAMO, instead of following the complete process of an initial approval to Part-CAO or Part-CAMO.

Depending on the current approval and scope held, the existing organisation may choose one of the below proposed transition paths:

Existing approval		New approval using transition	
Approval type	Scope	Approval type	Limitation
Part-M Subpart G	complex motor-powered aircraft (CMPA) <sup>1</sup> and/or aircraft used by licensed air carriers <sup>2</sup>	Part-CAMO	none
Part-M Subpart G	non-CMPA not used by licenced air carrier	<b>Or</b>	Part-CAO continuing airworthiness only
			Part-CAMO none
Part-M Subpart G	All types of aircraft and operation	Part-CAMO	none
Part-M Subpart F	non-CMPA not used by licenced air carrier	Part-CAO	maintenance only
		No transition facilitation to Part-145 (initial approval required)	Not applicable
Part-145	non-CMPA not used by licenced air carrier	<b>Or</b>	Part-CAO maintenance only (see note 2)
			keep Part-145 (no transition) none
Part-145	All types of aircraft and operation	Transition to Part-CAO not possible for that scope of work: keep Part-145	Not applicable

**Note:** If an organisation holds both continuing airworthiness and maintenance approvals, this organisation can make a single request to the competent authority to transition both approvals to a single CAO (to the extent that both existing approvals satisfy the above transition paths)

The request from organisation to apply for such transition to Part-CAO and Part-CAMO should be made to the competent authority in a form and manner established by such authority. EASA kindly recommends to make such request as soon as possible, not waiting for this regulation to become applicable (24 march 2020) and not waiting for the end of the transition period (24 September 2021).

If an organisation wish to transition only one part of its activities to Part-CAO (e.g. non-CMPA scope of work of Part-145), EASA recommends to address this case as a new approval and not as a transition. This is because, in order to follow the transition process, an existing approved exposition or manual is required as a basis for that particular activity.

EASA reminds that this transition process will be under the oversight of the competent authority and that any particular case or situation should be discussed and agreed with the competent authority.

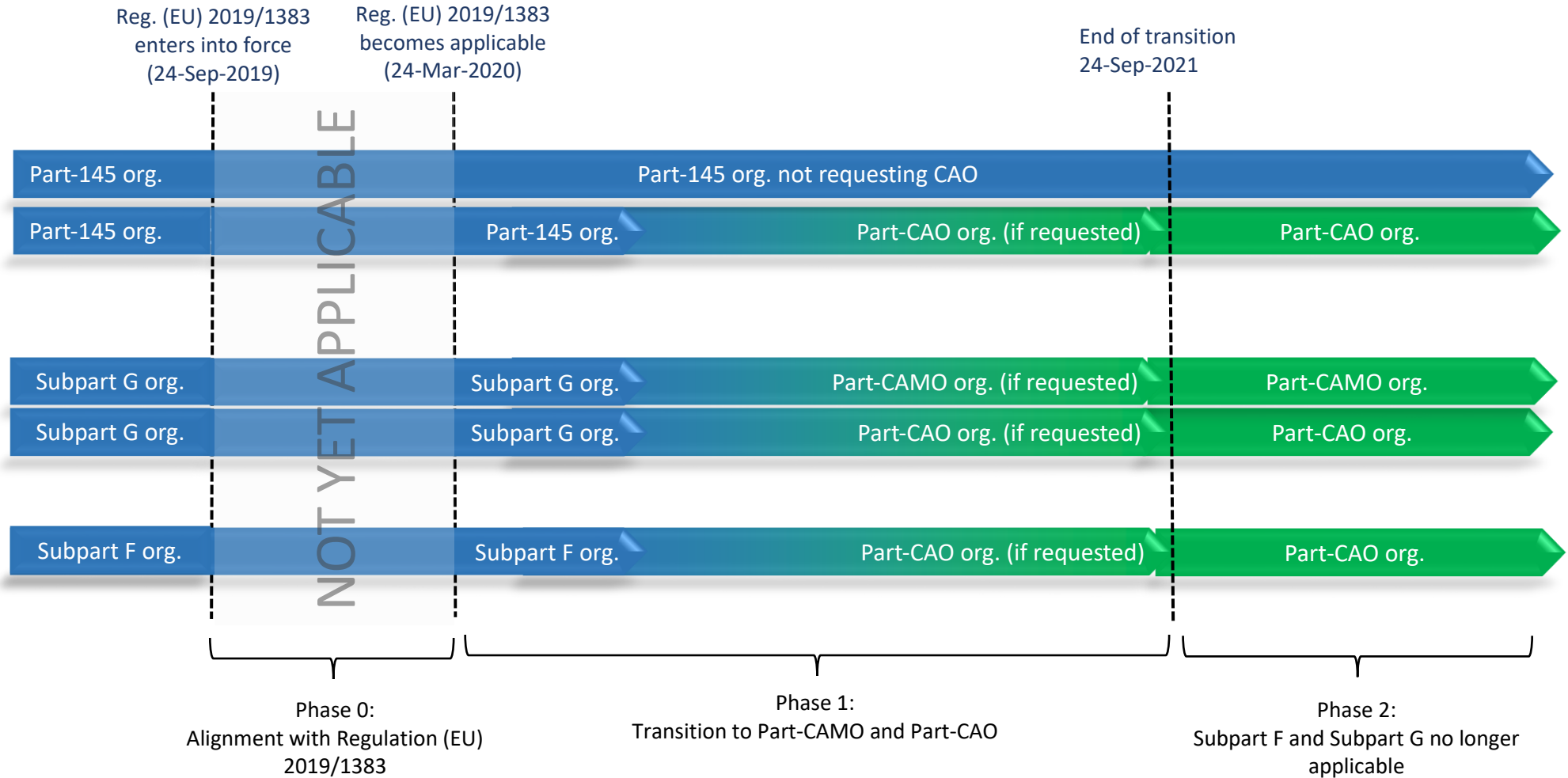
<sup>1</sup> Except for aeroplanes with a MTOM at or below 5 700 kg which are equipped with multiple turboprop engines (Art. 3(7)).

<sup>2</sup> Aircraft operation for which an operating licence delivered i.a.w. Regulation (EC) No 1008/2008 is required.

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### II. Overview

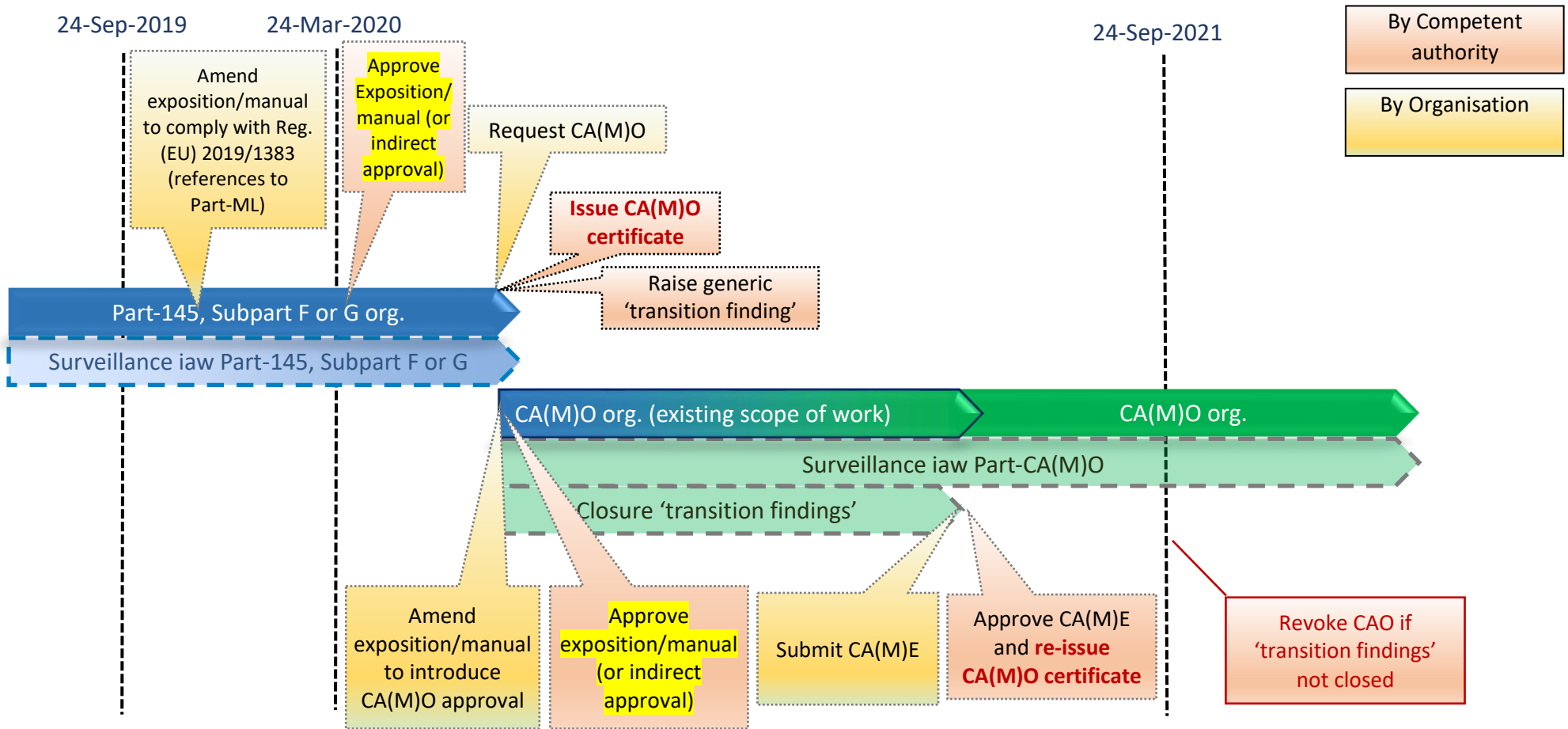
The following figure provides an overview of the expected transition process and chronology:



Note: Approvals to Part-M subpart F and subpart G may still be issued until 1 year after EIF

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The following figure provides an overview of the step approach developed in the next chapter.



Note: request for Part-CA(M)O may be sent to competent authority (CA) before the applicability date, but the CA can only issue the CA(M)O certificate after the applicability date

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### III. Steps approach for transition to Part-CA(M)O

The following propose a 10-steps approach for the transition to Part-CAO or Part-CAMO (thereafter referred to as 'Part-CA(M)O') originating from:

- Part-145; such organisation may otherwise continue their activities with the Part-145 approval;
- Part-MF; such organisation may otherwise continue their activities with the Part-MF approval only until 24 September 2021;
- Part-MG; such organisation may otherwise continue their activities with the Part-MG approval only until 24 September 2021.

Overview

Phase	Step	Description
0	0	<b>Compliance with Regulation (EU) 2019/1383</b>
1	1	<b>Eligibility check</b>
	2	<b>Request for Part-CA(M)O approval</b>
	3a	<b>Initial CA(M)O approval</b>
	3b	<b>Finding notifications</b>
	4	<b>Exposition/manual amendment</b>
	5	<b>Implementation plan</b>
	6	<b>Acceptance of the plan and oversight programme adjustment</b>
	7	<b>Oversight during transition</b>
	8	<b>Implementation plan execution</b>
9	<b>Final CA(M)O approval</b>	
2	10	<b>End of transition and changes to organisation</b>

Convention: in the following table, the term “exposition/manual” designates the type of document used by the organisation demonstrating compliance with Part-MF/-MG/-145 at the time when the organisation requests a transition to Part-CA(M)O, while the term “CA(M)E” designates the organisation exposition demonstrating compliance to Part-CA(M)O at the end of the transition process.

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Step	Action	Remark
0	<p><b>Compliance with Regulation (EU) 2019/1383</b></p> <p>It is assumed that when Regulation (EU) 2019/1383 becomes applicable, Part-145, Part-MF and Part-MG organisations have already made the necessary amendments to the exposition/manual to be in compliance with Part-145, Part-MF and Part-MG as amended by Reg. (EU) 2019/1383.</p> <p>Note: if the request for Part-CA(M)O approval (step 2) is made before 24 March 2020, it is acceptable to delay the formal amendment of the exposition/manual until step 4.</p>	<p>This means that Part-145, Part-MF and Part-MG organisations, if working on Part-ML aircraft, have introduced reference to (or amendments in compliance with) Part-ML.</p> <p>Appendix I provides a list of some of the main changes introduced by Reg. (EU) 2019/1383</p> <p>Note: indirect approval of the exposition/manual is acceptable, unless otherwise specified by the competent authority.</p>
1	<p><b>Eligibility check</b></p> <p>The organisation reviews the eligibility for their organisation to transition to Part-CA(M)O, analysing existing (and future desired, where applicable) scope of work</p>	<p>Note: Part-CAO is applicable under the following conditions:</p> <ul style="list-style-type: none"> <li>a. The aircraft is not used by a licensed air carrier;</li> <li>b. The aircraft is not a complex motor-powered aircraft</li> </ul>
2	<p><b>Request for Part-CA(M)O approval</b></p> <p>The organisation requests a Part-CA(M)O approval to the competent authority in a form and manner acceptable to the competent authority.</p> <p>If this step 2 is made before 24 March 2020, the steps 0 and 4 can be combined.</p>	<p>Before 24 September 2021</p>
3a	<p><b>Initial CA(M)O approval</b></p> <p>After having verified the eligibility of the request, the competent authority:</p> <ul style="list-style-type: none"> <li>a. revokes the existing Part-MF/-MG or Part-145 certificate of the applicant;</li> <li>b. issues an 'EASA Form 3-CAO' or an 'EASA Form 14' certificate <u>without further showing</u> with a new approval reference ([Member State].CAO.[XXXX] or [Member State].CAMO.[XXXX]). This certificate must reflect the existing privileges of the organisation and not exceed the Part-CA(M)O defined privileges;</li> </ul>	<p>Not before 24 March 2020</p> <p>Initial EASA Form 3-CAO (for Part-CAO) or EASA Form 14 (for Part-CAMO) certificates should include, on page 2, the reference to the current exposition/manual with the mention "on the basis of Article 4(4)/4(5) of Regulation (EU) 2019/1383"</p>

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Step	Action	Remark
3b	<p><b>Finding notifications</b></p> <p>The competent authority also:</p> <ul style="list-style-type: none"> <li>c. notifies to the applicant a 'generic transition finding'</li> <li>d. closes the findings opened against Part-MF/-MG or Part-145 and re-notifies these 'oversight findings' against the relevant equivalent of Part-CA(M)O requirements with no change in agreed closure dates.</li> </ul> <p>Remark: if no equivalent requirement exist in Part-CA(M)O, the finding should be closed without further showing.</p>	<p><b>'Generic transition finding' (Level 2):</b></p> <p>"On the basis of Article 4(4) (or 4(5)) of Regulation (EU) 2019/1383, approval reference [Member State].CA(M)O.[XXXX] is issued to [Company name], but the organisation has not demonstrated that it complies with all requirements of Annex Vc (Part-CAMO) or Annex Vd (Part-CAO) to Regulation (EU) No 1321/2014. The organisation shall adopt an implementation plan and demonstrate to the satisfaction of the competent authority that it has taken the necessary measures to address the finding before 24 September 2021. In the meantime the organisation shall continue working with the existing procedures as per the exposition/manual amended to account for the new approval reference and Regulation (EU) 2019/1383."</p> <p>For the re-notification of existing findings, the competent authority may use the correspondence tables provided in appendices.</p>
4	<p><b>Exposition/manual amendment</b></p> <p>The organisation amends the existing exposition/manual to introduce the new approval reference ([Member State].CAO.[XXXX] or [Member State].CAMO.[XXXX]), in particular into EASA Form 1 and EASA Form 15 organisation templates. The organisation uses this amended exposition/manual until the re-issue of the Part-CA(M)O certificate and the approval of the CA(M)E (step 9).</p> <p>Note: If step 2 (request) was made before the applicability date, this amendment of the exposition/manual may integrate the changes necessary to comply with Regulation (EU) 2019/1383 (step 0).</p>	<p>Before any of these forms or approval reference are formally used.</p> <p>Indirect approval of the exposition/manual is acceptable, unless otherwise specified by the competent authority.</p>
5	<p><b>Implementation plan</b></p> <p>As a response to the 'generic transition finding', the organisation develops and submits a implementation plan that includes the following:</p> <ul style="list-style-type: none"> <li>• Gap analysis between the existing organisation procedures and the new Part-CA(M)O requirements.</li> <li>• A roadmap for developing the CA(M)E (compliant with Part-CA(M)O)</li> <li>• <b>Training of staff</b> on Part-CA(M)O and training on the future CA(M)E</li> </ul>	<p>For the gap analysis, please refer to the correspondence tables between Part-MF/-MG/-145 and Part-CAMO/-CAO provided in appendices.</p> <p>Note: The <b>CAE</b> should not be considered a revision of the existing exposition/manual but a <b>new document</b>.</p>



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Step	Action	Remark
6	<p><b>Acceptance of the implementation plan and oversight programme adjustment</b></p> <p>The competent authority assess the implementation plan proposed by the organisation, and if the assessment concludes that it is sufficient to address the finding, <u>accept this plan</u>.</p> <p>The competent authority also review the existing oversight programme, considering the following:</p> <ul style="list-style-type: none"> <li>• For requirements which are not new in Part-CA(M)O, the competent authority may take credit from oversight activities (audits, inspections, etc.) already performed as part of the ongoing oversight cycle to declare compliance of the organisation with concerned Part-CA(M)O requirements.</li> <li>• The current audit pattern may be continued, but should be reviewed to evaluate if the remaining time and scheduled oversight activities will allow the competent authority to check compliance of the organisation against every Part-CA(M)O requirement until the end of the current pattern. If not, the oversight programme should be reviewed and adjusted accordingly.</li> </ul>	<p>Please refer to the correspondence tables between Part-MF/-MG/-145 and Part-CAMO/-CAO provided in appendices.</p>
7	<p><b>Oversight during transition</b></p> <p>The competent authority continues to perform the oversight of the organisation, but in accordance with :</p> <ul style="list-style-type: none"> <li>• Part-CA(M)O;</li> <li>• the implementation plan;</li> <li>• the amended exposition/manual.</li> </ul>	<p>For the oversight activities during the transition period, it is proposed to use 2 types of findings:</p> <ul style="list-style-type: none"> <li>• <b>Transition finding:</b> Finding raised against requirements which are newly introduced in Part-CA(M)O. Closure date for these transition findings shall not exceed <b>24 September 2021</b>. This include the 'generic' transition finding.</li> <li>• <b>Oversight finding:</b> Finding raised against Part-CA(M)O requirements for which an equivalent requirement already exists in Part-MF/-MG/-145. Oversight findings should be managed in accordance with CAMO.B.350 or CAO.B.060 as applicable.</li> </ul> <p>Please refer to the correspondence tables between Part-MF/-MG/-145 and Part-CAMO/-CAO provided in appendices. Column 3 offers a recommended policy for the finding classification (transition vs oversight findings). This column also includes a summary of the novelties where relevant.</p>

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Step	Action	Remark
8	<p><b>Implementation plan execution</b></p> <p>Organisation execute the implementation plan, including acquisition of the necessary resource and the development of the CA(M)E. It should be ensured that the staff receives difference training on the future approved CA(M)E and associated procedures.</p> <p>The drafting of the CA(M)E should take into account the transition findings raised by the competent authority during the oversight. <b>But it should be avoided to submit successive exposition amendments for approval with the aim to close these transition findings individually.</b></p> <p>Once the CA(M)E is considered fully compliant with Part-CA(M)O, it shall be submitted to the competent authority for approval.</p>	<p>CA review the implementation by desktop audit and using a planned oversight audit.</p> <p>Note: The CAE should not be considered a revision of the existing manual/exposition but a new document.</p> <p>To help in the CAE development, appendixes VI, VII and VIII offer cross-references between the CAE and respectively the MOE, MOM and Part-MG CAME.</p>
9	<p><b>Final CA(M)O approval</b></p> <p>At this stage, the competent authority should have:</p> <ul style="list-style-type: none"> <li>• checked compliance of the organisation against every Part-CA(M)O requirements. <b>This should correspond to the end of the oversight cycle and a recommendation report should be issued;</b></li> <li>• checked that every <b>transition finding</b> raised during oversight has been closed;</li> <li>• implementation plan has been completed</li> </ul> <p>The competent authority approves the CA(M)E, <b>issue a revision of the 'EASA Form 3-CAO' or 'EASA Form 14' certificate</b> and closes the 'generic transition finding'.</p> <p>On the certificate, the mention introduced at step 3a should be removed and the reference to the CA(M)E should be introduced.</p>	<p><b>Before 24 September 2021</b></p> <p>Note: at this stage, an <b>oversight finding</b> may remain open, within the limit of CAMO.B.350 or CAO.B.060</p>

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Step	Action	Remark
10	<p><b>End of transition and changes to organisation</b></p> <p>At this stage, the organisation becomes a full compliant Part-CA(M)O organisation and therefore the present guide, and in its appendices, are no longer applicable.</p> <p>The organisation may apply for a change to withdraw a limitation introduced at step 3 or to extend the scope of work as foreseen by Part-CA(M)O.</p> <p>After 24 September 2021:</p> <ul style="list-style-type: none"> <li>• Part-MF/-MG organisations which have initiated, but not completed the transition to Part-CA(M)O shall be revoked, limited or suspended, in whole or in part;</li> <li>• Part-MF/-MG organisations which have not applied to a Part-CA(M)O shall be revoked.</li> </ul>	<p>Change must follow Part-CA(M)O requirements and the approved CA(M)E</p>

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### IV. Changes to the Part-MF, Part-MG or Part-145 organisation

The following constitutes the guidance for the management of the changes to the existing approved organisation, not related to the transition (e.g. change of nominated person)

- Request for changes submitted by the organisation before 24 March 2020 need to be managed as agreed with the competent authority
- Request for changes submitted by the organisation between 24 March 2020 and Step 9 need to follow the organisation change procedure (as specified, or referred to, in the exposition/manual) valid at time of request; new privilege provided for in Part-CAO (e.g. maintenance for a subpart G organisation) cannot be granted by the competent authority at this stage. The existing organisation exposition/manual should be amended to introduce this change before Step 9.
- A change approved and introduced in the existing organisation exposition/manual between Step 3 and Step 9 should normally be reflected in the CA(M)E under development.
- Request for changes submitted by the organisation after Step 9, need to follow Part-CA(M)O requirements and the approved CA(M)E

**Note:** this chapter relates to changes to the original organisation, not related to the transition; this does not prevent that, as part of the transition activities (and implementation plan) to Part-CAO, the organisation seeks a Part-CAO terms of approval at step 9 going beyond the original scope of approval (e.g. maintenance for a Part-MG organisation)

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### V. Proposed actions by Competent Authorities (CA):

1. Between entry into force and applicability date: amendment of CA procedures iaw Regulation (EU) 2019/1383 and training of staff
2. Develop CA implementation plan and monitor progress implementation
  - i. Provide information and guidance to impacted organisations and persons on main differences and novelties
    - Structure of regulation
    - Options for combinations of approvals and privileges
    - Application process considering CAO.A.015, CAO.A.020, CAO.A.025(b) and CAO.A.095 or CAMO.A.115, CAMO.A.125 and CAMO.A.300(b)
    - Deadlines and consequences (e.g. revocation)
  - ii. Update (IT) control systems and Forms
  - iii. Assess impact on resources and take necessary actions

### VI. Appendices

#### Appendix I — Compliance with Regulation (EU) 2019/1383

Before 24 March 2020 organisations holding a valid Part-MG, Part-MF or Part-145 approval certificate should amend their exposition/manual and associated procedures where applicable to account for changes introduced by Regulation (EU) 2019/1383.

For that purpose, below is a non-exhaustive list of some of the main changes:

##### **Airworthiness Review**

- EASA Forms 15a/b/c are updated. As of 24 March 2020, EASA Forms 15 have to be used as follows:
  - EASA Form 15a: to be issued by the competent authority for aircraft following Part-M regime.
  - EASA Form 15b: to be issued either by Part-CAMO or Part-CAO (or Subpart G during transition period) for aircraft following Part-M regime.
  - EASA Form 15c: to be issued either by Part-CAMO, Part-CAO, Subpart F, Subpart G, Part-145, independent airworthiness review staff, or the competent authority for aircraft following Part-ML regime.

Note: existing Airworthiness Review Certificates (ARC) issued before 24 March 2020 continue to be valid after 24 March 2020.

- As of 24 March 2020, Airworthiness reviews for light aircraft not used by licensed air carriers shall be performed in accordance with Subpart I of Part-ML
- EASA Form 15c becomes extendable and corresponding extension have to be carried out in accordance with ML.A.901(c).

##### **Continuing Airworthiness of aircraft following Part-ML**

- AMP of Part-ML aircraft shall be developed iaw ML.A.302. These AMP are no longer approved by the competent authority. They are approved by the CAMO or CAO (or declared by the owner if no CAMO/CAO is contracted). A new privilege of AMP approval is added in this respect to Part-MG organisations (M.A.711(a)(5)).

Note: existing AMPs approved in compliance with M.A.302 before 24 March 2020 continue to be valid after 24 March 2020.

- Defect management shall be performed according to ML.A.403 (there are alleviations).
- AMP development privilege for ELA2 aircraft not used in commercial operation is removed from Part-M Subpart F and Part-145. Concerned organisations are no longer allowed to process AMPs.

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### Appendix II — Part-CAMO vs Part-MG Correspondence table and transition oversight policy

Potential transition findings are identified un blue		
Part-M subpart G requirement where applicable	Part-CAMO requirement	Oversight policy to be applied to grandfathered Part-CAMO from 24 March 2020 to 24 September 2021
M.A.702 - Application	CAMO.A.115 – Application for an organisation certificate	In case of non-compliance with CAMO.A.115(a)/(b)(2), an oversight finding should be raised and managed i.a.w. CAMO.B.350.  CAMO.A.115(b)(1) is a new requirement for the organisation to provide the results of a pre-audit against the applicable requirements together with its application. When the organisation is grandfathered to Part-CAMO, provision of the result of that pre-audit is not mandatory at the time the Part-CAMO certificate is issued. If not already in place, the organisation should provide the competent authority with a procedure describing how changes not requiring prior approval will be managed and notified to the competent authority before 24 September 2021 (refer to CAMO.A.130).
N/A – New requirement introduced by Part-CAMO	CAMO.A.120 – Means of compliance	Potential transition finding if the organisation intends to use AltMoC: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition does not contain appropriate provisions to address CAMO.A.120 requirements”.
M.A.703 – Extend of approval	CAMO.A.125(a)/(b)/(c) – Terms of approval and privileges of the organisation	In case of non-compliance with CAMO.A.125(a)/(b)/(c), an oversight finding should be raised and managed i.a.w. CAMO.B.350.  CAMO.A.125 covers both M.A.703 and M.A.711 requirements (refer to the line dedicated to M.A.711), M.A.711 ‘Privileges of the organisation’ is incorporated (new points (d) to (f)) and relevant references updated. Only minor changes are made to the text stemming from M.A.711 to update the cross references and replace ‘quality system’ with ‘management system’. The text is further amended to include the Part-M/Part-ML references for the extension of the ARC (cf. point (d)(4)) and for the issue of a recommendation for the airworthiness review by the competent authority (cf. point (e)(2)).
M.A.711 – Privileges of the organisation	CAMO.A.125(d)/(e)/(f) – Terms of approval and privileges of the organisation	In case of non-compliance with CAMO.A.125(d)/(e)/(f), an oversight finding should be raised and managed i.a.w. CAMO.B.350.
M.A.713 – Changes to the approved continuing airworthiness organisation	CAMO.A.130 – Changes to the organisation	Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition does not contain necessary provisions to address CAMO.A.130 requirements”.  CAMO.A.130 introduces the term ‘changes not requiring prior approval’ replacing the ‘indirect approval’. Changes not requiring prior approval will be managed as agreed between the organisation and the authority. The organisation should amend current exposition to account for CAMO.A.130 before 24 September 2021.  Until the organisation is fully compliant with Part-CAMO changes to the organisation should be managed i.a.w. the organisation current approved procedure. As a result, in case of non-compliance with M.A.713 and/or with the current procedure in place within the organisation, an oversight finding should be raised and managed i.a.w. CAMO.B.350.
M.A.715 – Continued validity of approval	CAMO.A.135 – Continued validity	Changes are made to update references and for consistency throughout the new Part-CAMO. In case of non-compliance with CAMO.A.135, an oversight finding should be raised and managed i.a.w. CAMO.B.350.
N/A – New requirement introduced by Part-CAMO	CAMO.A.140 - Access	A new CAMO.A.140 Access is added. It contains the requirements for granting access to the competent authority for the purpose of determining continued compliance. In case of non-compliance with CAMO.A.140, an oversight finding should be raised and managed i.a.w. CAMO.B.350 as this requirement was already existing in point (a)(2) of M.A.715 and is therefore not considered as a novelty.

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Potential transition findings are identified un blue		
Part-M subpart G requirement where applicable	Part-CAMO requirement	Oversight policy to be applied to grandfathered Part-CAMO from 24 March 2020 to 24 September 2021
M.A.716 - Findings	CAMO.A.150 – Findings	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition procedure is not compliant with CAMO.A.150(a)(1)”.</p> <p>CAMO.A.150 add a requirement to identify the root causes of and contributing factors to the non-compliance. The organisation should amend current exposition to account for CAMO.A.150(a)(1) before 24 September 2021.</p> <p>In case of non-compliance with CAMO.A.150(a)(2)/(a)(3)/(b), an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p>
N/A –not explicit requirement in Part-MG	CAMO.A.155 – Immediate reaction to a safety problem	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition procedure is not compliant with CAMO.A.155”.</p> <p>CAMO.A.155 add a new requirement to implement any safety measures mandated by the competent authority and any relevant mandatory safety information issued by the Agency. Even if newly formally introduced through CAMO.A.155, this requirement is not considered as a novelty and apart from the case of the exposition update to account for that new article (refer to above transition finding), in case of non-compliance with CAMO.A.155, an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p>
N/A – Previous M.A.202 requirement transferred into Part-CAMO	CAMO.A.160 – Occurrence reporting	<p>A new CAMO.A.160 Occurrence reporting is added to introduce the occurrence reporting requirements applicable to CAMOs. As similar M.A.202 requirement applied to Part-MG organisation, CAMO.A.160 is not considered as a novelty and in case of non-compliances with CAMO.A.160, an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p>
M.A.712 – Quality system	CAMO.A.200 – Management system	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition procedure is not compliant with CAMO.A.200(a)(2)/(a)(3)/(a)(5)”.</p> <p>The organisation should amend current exposition quality system procedure to account for CAMO.A.200 and CAMO.A.202. Main novelties compared to M.A.712 are:</p> <ul style="list-style-type: none"> <li>• CAMO.A.200(a)(2): Safety policy.</li> <li>• CAMO.A.200(a)(3): identification of aviation safety hazards and management of associated risks.</li> <li>• CAMO.A.200(a)(5): documentation of all management system key processes.</li> </ul> <p>In case of non-compliance with CAMO.A.200(a)(1)/(a)(4)/(a)(6)/(a)(7)/(b)/(c)/(d) an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p>
	CAMO.A.202 – Internal safety reporting scheme	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition does not contain necessary provisions to address CAMO.A.160 requirements”.</p> <p>A new CAMO.A.202 Internal safety reporting scheme is added to establish an internal reporting scheme supporting the organisation’s hazard identification and safety risk management processes and fostering its safety culture. The internal reporting scheme shall also be accessible to organisations working under the CAMO’s management system. It also forms the basis for establishing mandatory and voluntary occurrence reporting as required by Regulation (EU) No 376/2014.</p> <p>The organisation should amend its procedures to account for CAMO.A.202 before 24 September 2021.</p>



## GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO

Potential transition findings are identified un blue		
Part-M subpart G requirement where applicable	Part-CAMO requirement	Oversight policy to be applied to grandfathered Part-CAMO from 24 March 2020 to 24 September 2021
N/A - New requirement introduced in Part-CAMO	CAMO.A.205 – Contracting and subcontracting	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition procedure is not compliant with CAMO.A.205(a)(2)”.</p> <p>A new CAMO.A.205 Contracting and subcontracting is added to clarify the responsibility of the CAMO to ensure that any contracting (maintenance) or subcontracting (specific continuing-airworthiness-management-related activities) complies with applicable requirements. In this context it is important to clarify that the term ‘subcontracting’ covers cases where the contracted organisation is itself Part-CAMO or Part-CAO approved and cases where such organisation is not Part-CAMO/Part-CAO approved. Any continuing-airworthiness-management related services provided by third parties are to be considered ‘subcontracting under the management system’ for the purpose of Part-CAMO.</p> <p>The organisation should amend current exposition to account for CAMO.A.205(a)(2) before 24 September 2021. In case of non-compliance with CAMO.A.205(a)(1)(b), an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p>
M.A.705 - Facilities	CAMO.A.215 - Facilities	In case of non-compliance with CAMO.A.215, an oversight finding should be raised and managed i.a.w. CAMO.B.350
M.A.714(a)(1)/(a)(3)/(a)(4)/(a)(5)/(a)(6)/(f)/(e) – Records-keeping	CAMO.A.220(a)(1)/(a)(3)/(a)(4)/(a)(6)/(d)/(f) – Records-keeping	<p>In case of non-compliance with CAMO.A.220(a)(1)/(a)(3)/(a)(4)/(a)(6)/(d)/(f), an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p> <p>The record-keeping duration for aircraft related records is changed to 3 years after the responsibility for the aircraft has been permanently transferred, to align with the validity of the airworthiness review certificate (ARC) and 1 year for aircraft permanently withdrawn from service.</p> <p>In addition, record keeping duration for personnel records is 3 years after a person has left the organisation. This will ensure that for any ARC issued, personnel records will remain accessible for the entire ARC validity, including in the case a person has left the CAMO shortly after an ARC was issued.</p>
N/A – New requirement introduced by Part-CAMO	CAMO.A.220(a)(2)/(a)(5)/(b)/(e) – Records-keeping	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition is not compliant with CAMO.A.220(a)(2)/(a)(5)/(b)/(e)”.</p> <p>CAMO.A.220 Record-keeping includes management-system-. A record-keeping duration of 5 years for management-system-related records is introduced (the same record-keeping duration applies in the area of Aircrew and Air Operations). In addition, the organisation shall record all details of work carried out and the format of the records shall be specified in the organisation’s manual.</p>
M.A.706(h) – Personnel M.A.707(e) – Airworthiness Review Staff	CAMO.A.220(c) – Records-keeping	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition is not compliant with CAMO.A.220(c)”.</p> <p>CAMO.A.220 Record-keeping includes personnel related record-keeping. Personnel-related records (qualification and experience) shall include personnel involved in safety management and be kept until 3 years after a person has left the organisation.</p>
M.A.707(e) – Airworthiness Review Staff	CAMO.A.220(c)(1)(ii)/(2)/(3) – Records-keeping	In case of non-compliance with CAMO.A.220(c)(1)(ii)/(c)(2)/(c)(3), an oversight finding should be raised and managed i.a.w. CAMO.B.350 except if corresponding records have been kept for only 2 years.

## GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO

Potential transition findings are identified un blue		
Part-M subpart G requirement where applicable	Part-CAMO requirement	Oversight policy to be applied to grandfathered Part-CAMO from 24 March 2020 to 24 September 2021
M.A.704 – Continuing airworthiness management exposition	CAMO.A.300 – Continuing airworthiness management exposition	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition is not compliant with CAMO.A.300”.</p> <p>CAMO.A.300 include additional management-system-related elements, such as:</p> <ul style="list-style-type: none"> <li>• the safety policy,</li> <li>• a description of the internal safety reporting scheme (CAMO.A.202),</li> <li>• a general description of how the organisation ensures availability of staff (CAMO.A.305(d)),</li> <li>• a procedure defining the scope of changes not requiring prior approval and describing how such changes will be managed and notified (CAMO.A.115(b) and CAMO.A.130(c)), the procedures specifying how the organisation controls any contracted or subcontracted tasks, including contracted maintenance (CAMO.A.315(c)),</li> <li>• a list of currently approved alternative means of compliance and, if any, a procedure to issue an AltMOC.</li> <li>• The compliance statement in point (a)(1) is amended to cover all Part-M, Part-ML, and Part-CAMO requirements, as applicable.</li> <li>• In point (a)(11) additional clarification is provided on the procedures required specifying how the organisation ensures compliance with Part-CAMO, Part-M and Part-ML.</li> <li>• In point (a)(9), now (a)(12), the requirement for a list of approved maintenance programmes is clarified, by stating this is only relevant for aircraft for which a contract exists for continuing airworthiness management, not being required for initial approval of the CAMO. Accordingly, baseline and generic maintenance programmes are no longer required (see also CAMO.A.325).</li> <li>• Point (b) is reviewed to specify that the initial CAME is subject to competent authority approval.</li> <li>• A requirement to maintain the CAME to remain an up-to-date description of the organisation is also added.</li> <li>• Point (c) on amendments to the CAME refers to the changes requiring prior approval (cf. CAMO.A.130(a)) and to the new provisions on managing changes without prior competent authority approval, based on an agreed procedure.</li> </ul> <p>The organisation should amend current exposition to account for CAMO.A.300 . As long as the organisation is not fully compliant with Part-CAMO, any non-compliance with CAMO.A.300 should be classified as a transition finding with 21/08/2021 as closure date except when there is a non-compliance with M.A.704 which should be classified i.a.w. CAMO.B.350.</p>
M.A.706(a)/(b)/(c)/(d)/(e)/(f)/(g)/(i)/(j)/(k) – Personnel requirements (also M.A.712(a))	CAMO.A.305(a)(1)/(a)(3)/(a)(4)/(a)(6)/(a)(7)/(b)/(c)/(d)/(e)/(f)/(g) – Personnel requirements	In case of non-compliance with CAMO.A.305(a)(1)/(a)(3)/(a)(4)/(a)(6)/(a)(7)/(b)/(c)/(d)/(e)/(f)/(g), an oversight finding should be raised and managed i.a.w. CAMO.B.350 <b>except if the non-compliance concerns understanding of safety management and human factors principles appropriate to the person’s function and responsibilities where a transition finding should be raised.</b>

## GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO

Potential transition findings are identified un blue		
Part-M subpart G requirement where applicable	Part-CAMO requirement	Oversight policy to be applied to grandfathered Part-CAMO from 24 March 2020 to 24 September 2021
N/A - New requirement introduced in Part-CAMO	CAMO.A.305(a)(2)/(a)(5) – Personnel requirements	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition is not compliant with CAMO.A.305(a)(2)/(a)(5)”.</p> <ul style="list-style-type: none"> <li>• CAMO.A.305 includes the nomination of a person or group of persons for the compliance monitoring function and for safety-management related responsibilities, to clarify the responsibilities of the accountable manager, and to state that competence must include an understanding of the application of safety management and human factors principles and human performance issues.</li> <li>• Additional changes are made to improve the overall structure of this IR and to clarify the link with Part-ORO. In particular, point (b)(1) states that for organisations also approved as licensed air carriers the accountable manager shall be the person appointed as accountable manager for the air carrier as required by point ORO.GEN.210(a) of Part-ORO. The requirement for a nominated postholder maintenance, included in point (b)(2), is aligned with Part-ORO (reference is made to ‘person responsible for the management and supervision of continuing airworthiness’).</li> <li>• A requirement is added for a system to plan the availability of staff to ensure that the organisation has sufficient appropriately qualified staff to plan, perform, supervise, inspect and monitor its activities in accordance with the terms of approval (new point (d)).</li> <li>• A new point (e) is added to include in CAMO.A.305 the reference to airworthiness review staff currently embedded in M.A.707 point (a). This way, CAMO.A.305 includes the requirements for all categories of staff and CAMO.A.310 may concentrate on airworthiness review staff qualification requirements.</li> </ul>
M.A.707 – Airworthiness review staff	CAMO.A.310 – Airworthiness review staff qualification	<p>In case of non-compliance with CAMO.A.310, an oversight finding should be raised and managed i.a.w. CAMO.B.350 <b>except if the non-compliance concerns understanding of safety management and human factors principles by Airworthiness Review Staff where a transition finding should be raised.</b></p> <ul style="list-style-type: none"> <li>• M.A.707 point (j) on titles and names of persons to be kept updated in the CAME is deleted; this is already addressed in CAMO.A.300(a)(4).</li> <li>• M.A.707 point (k) is amended to require that competence include an understanding of safety management and human factors principles appropriate to the person’s function and responsibilities in the organisation and to include a reference to personnel involved in airworthiness reviews or recommendations, and, if applicable, issuing permits to fly, to reflect the new point CAMO.A.305(e).</li> <li>• specific qualification requirements not applicable within the scope of Part-CAMO are removed.</li> <li>• Point (d) on listing airworthiness review staff in the CAME is deleted as this is already addressed in point CAMO.A.300(a)(7).</li> <li>• These airworthiness review staff qualifications apply regardless of the aircraft managed, meaning for example that a Part-CAMO-approved organisation performing airworthiness reviews of aircraft other than CMPA may not use airworthiness review staff complying with the ‘lower’ requirements of the new Part-CAO.</li> </ul>

## GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO

Potential transition findings are identified un blue		
Part-M subpart G requirement where applicable	Part-CAMO requirement	Oversight policy to be applied to grandfathered Part-CAMO from 24 March 2020 to 24 September 2021
M.A.708 – Continuing airworthiness management	CAMO.A.315 – Continuing airworthiness management	<p>In case of non-compliance with CAMO.A.310, an oversight finding should be raised and managed i.a.w. CAMO.B.350 <b>except in case of non-compliance with CAMO.A.315(b)(4) (default in using the organisation’s safety risk management process) where a transition finding should be raised.</b></p> <ul style="list-style-type: none"> <li>• CAMO.A.315 Continuing airworthiness management is reviewed to eliminate overlaps with M.A.301. The underlying principle is that purely technical requirements are included in Part-M and that Part-CAMO focuses on the related organisational responsibilities. This will improve consistency and facilitate future amendments.</li> <li>• Additional changes are made to update relevant cross references. Point (c) is amended to update the reference to ‘CAT’ by ‘licensed air carriers in accordance with Regulation (EC) No 1008/2008’, and to include the consultation with the operator. As a Part-CAMO-approved organisation may also manage the continuing airworthiness of other than CMPA or of aircraft not used by licensed air carriers, references to Part-CAO organisations are added and references to Subpart F maintenance organisations are maintained (to allow for a smooth transition to Part-CAO, Subpart F will be maintained during the transition period).</li> <li>• Point (e) is added to include a requirement for human factors principles and human performance limitations to be taken into account for any continuing airworthiness management tasks.</li> </ul>
M.A.710 – Airworthiness review	CAMO.A.320 – Airworthiness review	<p>In case of non-compliance with CAMO.A.320, an oversight finding should be raised and managed i.a.w. CAMO.B.350</p> <p>The text of existing M.A.710 is replaced with a requirement to follow either Part-M Section A point M.A.901 or Part-ML Section A point ML.903, depending on the aircraft managed. The specific elements constituting the airworthiness review process are transferred to those Part-M and Part-ML IRs.</p>
M.A.709 – Documentation	CAMO.A.325 – Continuing airworthiness management data	<p>In case of non-compliance with CAMO.A.325, an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p> <p>CAMO.A.325 Continuing airworthiness management data is changed for consistency to reflect the scope of the new Part-CAMO and to update the relevant cross references. Point (b) is deleted as the requirement to produce baseline or generic maintenance programmes is not maintained.</p>

## GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO

### Appendix III — Part-CAO vs Part-MG Correspondence table and transition oversight policy

Potential transition findings are identified in blue		
Part-M subpart G requirement where applicable	Part-CAO requirement	Oversight policy to be applied to grandfathered Part-CAO from 24 March 2020 to 24 September 2021
M.A.702 - Application	CAO.A.015 – Application for an organisation certificate	In case of non-compliance with CAO.A.015, an oversight finding should be raised and managed i.a.w. CAO.B.060.
N/A – New requirement introduced by Part-CAO	CAO.A.017 – Means of compliance	Potential transition finding if the organisation intends to use AltMoC: “Due to on-going transition from Part-M subpart G to Part-CAO, current exposition does not contain appropriate provisions to address CAO.A.017 requirements”.
M.A.703 – Extend of approval	CAO.A.020 – Terms of approval	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAO, current exposition is not compliant with CAO.A.020 requirements”.</p> <p>The above transition finding is meant to address format changes in the way the scope of work is described in the organisation manual. In case the grandfathered Part-CAO organisation uses privileges on aircraft/component that are out of its scope, an oversight finding should be raised against CAO.A.020. The organisation should amend its scope of work as specified by CAO.A.020 before 24 September 2021.</p>
M.A.704 – Continuing airworthiness management exposition	CAO.A.025 – Combined airworthiness exposition	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAO, current exposition is not compliant with CAO.A.025”.</p> <p>Structure of the CAE is as follows:</p> <ul style="list-style-type: none"> <li>• The CAE is made of the 4 following parts: <ul style="list-style-type: none"> <li>○ Part A – General description</li> <li>○ Part B - General procedures</li> <li>○ Part C – Maintenance procedures</li> <li>○ Part D – Continuing airworthiness management procedures</li> <li>○ Part E – Supporting documents</li> </ul> </li> <li>• Organisation grandfathered as Part-CAO based on a Part-MG should prepare a CAE which covers Part A, Part B, Part D and Part E. To help the organisation in preparing the CAE based on existing exposition: <ul style="list-style-type: none"> <li>○ A table comparing CAE with Part-MG exposition is available in annex 2-2, and</li> <li>○ A detailed table of content of the CAE along with CAO requirements to be covered by each section of the CAE is provided in AMC1 CAO.A.025.</li> </ul> </li> </ul> <p>The organisation should develop a CAE to account for CAO.A.025. As long as the organisation is not fully compliant with Part-CAO, any non-compliance with CAO.A.025 should be classified as a transition finding with 24 September 2021 as closure date except when there is a non-compliance with M.A.704 which should be classified i.a.w. CAO.B.060.</p>
M.A.705 - Facilities	CAO.A.030 - Facilities	In case of non-compliance with CAO.A.030, an oversight finding should be raised and managed i.a.w. CAO.B.060
M.A.706 - Personnel requirements	CAO.A.035 – Personnel requirements	In case of non-compliance with CAO.A.035, an oversight finding should be raised and managed i.a.w. CAO.B.060

## GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO

Potential transition findings are identified un blue		
Part-M subpart G requirement where applicable	Part-CAO requirement	Oversight policy to be applied to grandfathered Part-CAO from 24 March 2020 to 24 September 2021
M.A.707 – Airworthiness review staff	CAO.A.045 – Airworthiness review staff	In case of non-compliance with CAO.A.045, an oversight finding should be raised and managed i.a.w. CAO.B.060
M.A.708(a)/(b)(2)/(b)(3)/(b)(4)/(b)(5)/(b)(6)/(b)(7)/(b)(8)/(b)(9)/(b)(10)/(c)/(d) – Continuing airworthiness management	CAO.A.075(a)/(b)(1)(ii)/(b)(2)/(b)(3)/(b)(4)/(b)(5)/(b)(6)/(b)(7)/(b)(8)/(b)(9)/(b)(10) – Continuing airworthiness management	In case of non-compliance with CAO.A.075(a)(b)(1)(ii)(2)(3)(4)(5)(6)(7)(8)(9)(10), an oversight finding should be raised and managed i.a.w. CAO.B.060.  CAO.A.075 Continuing airworthiness management is reviewed to eliminate overlaps with M.A.301 and ML.A.301. The underlying principle is that purely technical requirements are included in Part-M and Part-ML and that Part-CAO focuses on the related organisational responsibilities. This will improve consistency and facilitate future amendments.
M.A.708(b)(1) – Continuing airworthiness management	CAO.A.075(b)(1)(i) – Continuing airworthiness management	Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAO, current exposition does not contain necessary provisions to address CAO.A.075(b)(1)(i)”.
M.A.709 – Documentation	CAO.A.080 – Continuing airworthiness management data	In case of non-compliance with CAO.A.080, an oversight finding should be raised and managed i.a.w. CAO.B.060
M.A.710 – Airworthiness review	CAO.A.085 – Airworthiness review	In case of non-compliance with CAO.A.085, an oversight finding should be raised and managed i.a.w. CAO.B.060  The text of existing M.A.710 is replaced with a requirement to follow either Part-M Section A point M.A.901 or Part-ML Section A point ML.903, depending on the aircraft managed. The specific elements constituting the airworthiness review process are transferred to those Part-M and Part-ML IRs.
M.A.714 – Records-keeping	CAO.A.090(a)(2)/(a)(3)/(a)(4)/(c)/(d)/(e)/(f)/(g)(2) – Records-keeping	In case of non-compliance with CAO.A.090(a)(2)(3)(4)(c)(d)(e)(f)(g)(2), an oversight finding should be raised and managed i.a.w. CAO.B.060.
M.A.711 – Privileges of the organisation	CAO.A.095(b)(1)/(b)(3)/(b)(4)/(c)/(d)/(e) – Privileges of the organisation	In case of non-compliance with CAO.A.095(b)(1)(3)(4)(c)(d)(e), an oversight finding should be raised and managed i.a.w. CAO.B.060.
N/A – New requirement introduced by Part-CAO	CAO.A.095(b)(2) – Privileges of the organisation	Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAO, current exposition does not contain necessary provisions to address CAO.A.095(b)(2) requirements”.
M.A.712 – Quality system	CAO.A.100 – Quality system and organisational review	In case of non-compliance with CAO.A.100, an oversight finding should be raised and managed i.a.w. CAO.B.060. A Part-CAO can elect to replace its quality system by an organizational review when one of the following condition is met: <ul style="list-style-type: none"> <li>• The scope of the CAO does only contain aircraft covered by Part-ML</li> <li>• The CAO does not exceed 10 full-time equivalent staff involved in maintenance</li> <li>• The CAO does not exceed 5 full-time equivalent staff involved in continuing airworthiness management</li> </ul>

## GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO

Potential transition findings are identified un blue		
Part-M subpart G requirement where applicable	Part-CAO requirement	Oversight policy to be applied to grandfathered Part-CAO from 24 March 2020 to 24 September 2021
M.A.713 – Changes to the approved continuing airworthiness organisation	CAO.A.105 – Changes to the organisation	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAO, current exposition does not contain necessary provisions to address CAO.A.105 requirements”.</p> <p>As opposed to Part-MG where approval of the exposition can optionally be performed through indirect approval, Part-CAO mandate the organisation to have a procedure to address changes not requiring prior approval. Changes not requiring prior approval will be managed as agreed between the organisation and the authority,. The organisation should develop a procedure to account for CAO.A.105 before 24 September 2021.</p> <p>Until the organisation is fully compliant with Part-CAO, changes to the organisation should be managed i.a.w. the organisation current approved procedure. As a result, in case of non compliance with M.A.713 and/or with the current procedure in place within the organisation, an oversight finding should be raised and managed i.a.w. CAO.B.060.</p>
M.A.715 – Continued validity of approval	CAO.A.110 – Continued validity	<p>Minor changes are made to update references and for consistency throughout the new Part-CAO.</p> <p>In case of non-compliance with CAO.A.110, an oversight finding should be raised and managed i.a.w. CAO.B.060.</p>
M.A.716 - Findings	CAO.A.115 – Findings	In case of non-compliance with CAO.A.115, an oversight finding should be raised and managed i.a.w. CAO.B.060.

## GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO

### Appendix IV – Part-CAO vs Part-MF Correspondence table and transition oversight policy

Potential transition findings are identified in blue		
Part-M subpart F requirement where applicable	Part-CAO requirement	Oversight policy to be applied to grandfathered Part-CAO from 24 March 2020 to 24 September 2021
M.A.602 - Application	CAO.A.015 – Application for an organisation certificate	In case of non-compliance with CAO.A.015, an oversight finding should be raised and managed i.a.w. CAO.B.060.
N/A – New requirement introduced by Part-CAO	CAO.A.017 – Means of compliance	Potential transition finding if the organisation intends to use AltMoC: “Due to on-going transition from Part-M subpart F to Part-CAO, current manual does not contain appropriate provisions to address CAO.A.017 requirements”.
M.A.603 – Extend of approval	CAO.A.020 – Terms of approval	<p>Potential transition finding: “Due to on-going transition from Part-M subpart F to Part-CAO, current manual is not compliant with CAO.A.020 requirements”.</p> <p>The above transition finding is meant to address format changes in the way the scope of work is described in the organisation manual. In case the grandfathered Part-CAO organisation uses privileges on aircraft/component that are out of its scope, an oversight finding should be raised against CAO.A.020. The organisation should amend its scope of work as specified by CAO.A.020 before 24 September 2021.</p> <p>CAO.A.020(a)(3) introduces the following limitation: a CAO which employs only one person for both planning and carrying out of all maintenance tasks cannot hold privileges for the maintenance of:</p> <ul style="list-style-type: none"> <li>• aeroplanes equipped with a turbine engine (in the case of aircraft-rated organisations);</li> <li>• helicopters equipped with a turbine engine or with more than one piston engine (in the case of aircraft-rated organisations);</li> <li>• complete piston engines of 450 HP and above (in the case of engine-rated organisations); and</li> <li>• complete turbine engines (in the case of engine-rated organisations).</li> </ul> <p>Current Part-MF organisation being in one of the above situation cannot be grandfathered as a Part-CAO.</p>



## GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO

Potential transition findings are identified un blue		
Part-M subpart F requirement where applicable	Part-CAO requirement	Oversight policy to be applied to grandfathered Part-CAO from 24 March 2020 to 24 September 2021
M.A.604 – Maintenance organisation manual	CAO.A.025 – Combined airworthiness exposition	<p>Potential transition finding: “Due to on-going transition from Part-M subpart F to Part-CAO, current manual is not compliant with CAO.A.025”.</p> <p>Structure of the CAE is as follows:</p> <ul style="list-style-type: none"> <li>• The CAE is made of the 4 following parts: <ul style="list-style-type: none"> <li>○ Part A – General description</li> <li>○ Part B - General procedures</li> <li>○ Part C – Maintenance procedures</li> <li>○ Part D – Continuing airworthiness management procedures</li> <li>○ Part E – Supporting documents</li> </ul> </li> <li>• Organisation grandfathered as Part-CAO based on a Part-MF should prepare a CAE which covers Part A, Part B, Part C and Part E. To help the organisation in preparing the CAE based on existing manual: <ul style="list-style-type: none"> <li>○ A table comparing CAE with Part-MF manual is available in annex 3-2, and</li> <li>○ A detailed table of content of the CAE along with CAO requirements to be covered by each section of the CAE is provided in AMC1 CAO.A.025.</li> </ul> </li> </ul> <p>The organisation should develop a CAE to account for CAO.A.025. As long as the organisation is not fully compliant with Part-CAO, any non-compliance with CAO.A.025 should be classified as a transition finding with 24 September 2021 as closure date except when there is a non compliance with M.A.604 which should be classified i.a.w. CAO.B.060.</p>
M.A.605 - Facilities	CAO.A.030 - Facilities	In case of non-compliance with CAO.A.030, an oversight finding should be raised and managed i.a.w. CAO.B.060
M.A.606(a)/(b)/(c)/(d)/(e)/(f) - Personnel requirements	CAO.A.035 – Personnel requirements	In case of non-compliance with CAO.A.035, an oversight finding should be raised and managed i.a.w. CAO.B.060.
M.A.606(g)/(h) – Personnel requirements	CAO.A.040(c) – Certifying staff	In case of non-compliance with CAO.A.040(c), an oversight finding should be raised and managed i.a.w. CAO.B.060
M.A.607 – Certifying staff and airworthiness review staff	CAO.A.040(a)/(b)/(d) – Certifying staff	In case of non-compliance with CAO.A.040(a)(b)(d), an oversight finding should be raised and managed i.a.w. CAO.B.060
M.A.606(i) – Personnel requirements	CAO.A.045 – Airworthiness review staff	In case of non-compliance with CAO.A.045, an oversight finding should be raised and managed i.a.w. CAO.B.060. Requirements contained in CAO.A.045 are not covered by M.A.606(i) but were already applicable to Part-MF organisation performing airworthiness reviews through M.A.901(l) as applicable before 24 March 2020 and are therefore not considered as novelties.
M.A.608 – Components, equipment and tools	CAO.A.050 – Components, equipment and tools	In case of non-compliance with CAO.A.050, an oversight finding should be raised and managed i.a.w. CAO.B.060. CAO.A.050(b) requires the organisation to have a procedure to ensure that it has access to all equipment and tools necessary to carry out its work, used only on an occasional basis.
M.A.609 – Maintenance data	CAO.A.055(a) – Maintenance data and work orders	In case of non-compliance with CAO.A.055(a), an oversight finding should be raised and managed i.a.w. CAO.B.060.
M.A.610 – Maintenance work orders	CAO.A.055(b) – Maintenance data and work orders	In case of non-compliance with CAO.A.055(b), an oversight finding should be raised and managed i.a.w. CAO.B.060.
M.A.611 – Maintenance standards	CAO.A.060 – Maintenance standards	In case of non-compliance with CAO.A.060, an oversight finding should be raised and managed i.a.w. CAO.B.060.

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Potential transition findings are identified un blue		
Part-M subpart F requirement where applicable	Part-CAO requirement	Oversight policy to be applied to grandfathered Part-CAO from 24 March 2020 to 24 September 2021
M.A.612 – Certificate of release to service	CAO.A.065 – Aircraft certificate of release to service	In case of non-compliance with CAO.A.065, an oversight finding should be raised and managed i.a.w. CAO.B.060.
M.A.613 – Component certificate of release to service	CAO.A.070 – Component certificate of release to service	In case of non-compliance with CAO.A.070, an oversight finding should be raised and managed i.a.w. CAO.B.060.
M.A.609 – Documentation	CAO.A.080 – Continuing airworthiness management data	In case of non-compliance with CAO.A.080, an oversight finding should be raised and managed i.a.w. CAO.B.060
M.A.615(e) – Privileges of the organisation	CAO.A.085 – Airworthiness review CAO.A.095(c)(2) - Privileges of the organisation	In case of non-compliance with CAO.A.085, an oversight finding should be raised and managed i.a.w. CAO.B.060
M.A.614 – Maintenance and airworthiness review records	CAO.A.090– Records-keeping	In case of non-compliance with CAO.A.090, an oversight finding should be raised and managed i.a.w. CAO.B.060.
M.A.615(a)/(b)/(c)/(d) – Privileges of the organisation	CAO.A.095(a)(1)/(a)(2)/(a)(3)/(a)(4)/(c)(2)/(d) – Privileges of the organisation	In case of non-compliance with CAO.A.095(a)(1)(2)(3)(4)(c)(2)(d), an oversight finding should be raised and managed i.a.w. CAO.B.060.
M.A.616 – Organisational review	CAO.A.100(f) – Quality system and organisational review	In case of non-compliance with CAO.A.100(f), an oversight finding should be raised and managed i.a.w. CAO.B.060. A Part-CAO can elect to replace its quality system by an organisational review when one of the following condition is met: <ul style="list-style-type: none"> <li>• The scope of the CAO does only contain aircraft covered by Part-ML</li> <li>• The CAO does not exceed 10 full-time equivalent staff involved in maintenance</li> <li>• The CAO does not exceed 5 full-time equivalent staff involved in continuing airworthiness management</li> </ul>
M.A.617 – Changes to the approved continuing airworthiness organisation	CAO.A.105 – Changes to the organisation	Potential transition finding: “Due to on-going transition from Part-M subpart F to Part-CAO, current manual does not contain necessary provisions to address CAO.A.105 requirements”.  As opposed to Part-MF where approval of the manual can optionally be performed through indirect approval, Part-CAO mandate the organisation to have a procedure to address changes not requiring prior approval. Changes not requiring prior approval will be managed as agreed between the organisation and the authority. The organisation should develop a procedure to account for CAO.A.105 before 24 September 2021.  Until the organisation is fully compliant with Part-CAO, changes to the organisation should be managed i.a.w. the organisation current approved procedure. As a result, in case of non-compliance with M.A.617 and/or with the current procedure in place within the organisation, an oversight finding should be raised and managed i.a.w. CAO.B.060.
M.A.618 – Continued validity of approval	CAO.A.110 – Continued validity	Minor changes are made to update references and for consistency throughout the new Part-CAO. In case of non-compliance with CAO.A.110, an oversight finding should be raised and managed i.a.w. CAO.B.060.
M.A.619 - Findings	CAO.A.115 – Findings	In case of non-compliance with CAO.A.115, an oversight finding should be raised and managed i.a.w. CAO.B.060.

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Appendix V – Part-CAO vs Part-145 Correspondence table and transition oversight policy

Potential transition findings are identified un blue		
Part-145 requirement where applicable	Part-CAO requirement	Oversight policy to be applied to grandfathered Part-CAO from 24 March 2020 to 24 September 2021
145.A.15 - Application	CAO.A.015 – Application for an organisation certificate	In case of non-compliance with 145.A.15, an oversight finding should be raised and managed i.a.w. CAO.B.060.
N/A – New requirement introduced by Part-CAO	CAO.A.017 – Means of compliance	Potential transition finding if the organisation intends to use AltMoC: “Due to on-going transition from Part-145 to Part-CAO, current exposition does not contain appropriate provisions to address CAO.A.017 requirements”.
145.A.20 – Terms of approval	CAO.A.020 – Terms of approval	<p>Potential transition finding: “Due to on-going transition from Part-145 to Part-CAO, current exposition is not compliant with CAO.A.020 requirements”.</p> <p>The above transition finding is meant to address format changes in the way the scope of work is described in the organisation manual. In case the grandfathered Part-CAO organisation uses privileges on aircraft/component that are out of its scope, an oversight finding should be raised against CAO.A.020. The organisation should amend its scope of work as specified by CAO.A.020 before 24 September 2021.</p> <p>CAO.A.020(a)(3) introduces the following limitation: a CAO which employs only one person for both planning and carrying out of all maintenance tasks cannot hold privileges for the maintenance of:</p> <ul style="list-style-type: none"> <li>• aeroplanes equipped with a turbine engine (in the case of aircraft-rated organisations);</li> <li>• helicopters equipped with a turbine engine or with more than one piston engine (in the case of aircraft-rated organisations);</li> <li>• complete piston engines of 450 HP and above (in the case of engine-rated organisations); and</li> <li>• complete turbine engines (in the case of engine-rated organisations).</li> </ul> <p>Current Part-145 organisation being in one of the above situation cannot be grandfathered as a Part-CAO.</p>

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Potential transition findings are identified un blue		
Part-145 requirement where applicable	Part-CAO requirement	Oversight policy to be applied to grandfathered Part-CAO from 24 March 2020 to 24 September 2021
145.A.70 – Maintenance organisation exposition	CAO.A.025 – Combined airworthiness exposition	<p>Potential transition finding: “Due to on-going transition from Part-145 to Part-CAO, current exposition is not compliant with CAO.A.025”.</p> <p>Structure of the CAE is as follows:</p> <ul style="list-style-type: none"> <li>• The CAE is made of the 4 following parts: <ul style="list-style-type: none"> <li>○ Part A – General description</li> <li>○ Part B - General procedures</li> <li>○ Part C – Maintenance procedures</li> <li>○ Part D – Continuing airworthiness management procedures</li> <li>○ Part E – Supporting documents</li> </ul> </li> <li>• Organisation grandfathered as Part-CAO based on a Part-145 should prepare a CAE which covers Part A, Part B, Part C and Part E. To help the organisation in preparing the CAE based on existing manual: <ul style="list-style-type: none"> <li>○ A table comparing CAE with Part-145 exposition is available in annex 4-2, and</li> <li>○ A detailed table of content of the CAE along with CAO requirements to be covered by each section of the CAE is provided in AMC1 CAO.A.025.</li> </ul> </li> </ul> <p>The organisation should develop a CAE to account for CAMO.A.025. As long as the organisation is not fully compliant with Part-CAO, any non-compliance with CAO.A.025 should be classified as a transition finding with 24 September 2021 as closure date except when there is a non-compliance with 145.A.70 which should be classified i.a.w. CAO.B.060.</p>
145.A.25 - Facilities	CAO.A.030 – Facilities CAO.A.060(b)/(f) – Maintenance standards	In case of non-compliance with CAO.A.030 or CAO.A.060(b)(f), an oversight finding should be raised and managed i.a.w. CAO.B.060
145.A.30(a)/(b)/(d)/(e)/(f) – Personnel requirements	CAO.A.035 – Personnel requirements	In case of non-compliance with CAO.A.035, an oversight finding should be raised and managed i.a.w. CAO.B.060.
145.A.30(g)/(h)/(i)/(j)(3)/(j)(4)/(j)(5) – Personnel requirements	CAO.A.040(a)/(b)/(c) – Certifying staff CAO.A.060(a) – Maintenance standards	In case of non-compliance with CAO.A.040 or CAO.A.060(a), an oversight finding should be raised and managed i.a.w. CAO.B.060. Provisions given by 145.A.30(j)(1)(2) are not available in Part-CAO.
145.A.30(k) – Personnel requirements	CAO.A.045(a)/(b)/(c)/(d) – Airworthiness review staff	In case of non-compliance with CAO.A.045, an oversight finding should be raised and managed i.a.w. CAO.B.060. Requirements contained in CAO.A.045 are not covered by 145.A.30(k) but were already applicable to Part-145 organisation performing airworthiness reviews through M.A.901(l) as applicable before 24 March 2020 and are therefore not considered as novelties.
145.A.35(j) – Certifying staff and support staff	CAO.A.040(d) – Certifying staff	In case of non-compliance with CAO.A.040(d), an oversight finding should be raised and managed i.a.w. CAO.B.060.

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Potential transition findings are identified un blue		
Part-145 requirement where applicable	Part-CAO requirement	Oversight policy to be applied to grandfathered Part-CAO from 24 March 2020 to 24 September 2021
145.A.35(a)/(b)/(c)/(d)/(e)/(f)/(g)/(h)/(i)/(k)/(l)/(m)/(n)/(o) – Certifying staff and support staff	N/A – No equivalent requirement in Part-CAO	<p>In Part-CAO there is no “base” and “line” maintenance and therefore there is no “support staff” vs “certifying staff”. As stated in CAO.A.040, Certifying staff shall exercise their privileges to release maintenance if the CAO has ensured:</p> <ul style="list-style-type: none"> <li>• that these certifying staff meet the requirements of point (b) of point 66.A.20 of Annex III (Part-66) except when paragraph 6 of Article 5 refers to a national regulation of a Member State, in which case, they shall meet the requirements of such a regulation;</li> <li>• that these certifying staff have an adequate understanding of the relevant aircraft or aircraft component(s) to be maintained, or both, as well as of the organisation procedures required to perform such maintenance.</li> </ul> <p>In case of open non-compliance against 145.A.35(a)(b)(c)(d)(e)(f)(g)(h)(i)(k)(l)(m)(n)(o) when the organisation is grandfathered as a Part-CAO, compliance against CAO.A.040 should be evaluated and if the situation is compliant with CAO.A.040, the finding should be cancelled.</p>
145.A.36 – Records of airworthiness review staff	CAO.A.045(e) – Airworthiness review staff	In case of non-compliance with CAO.A.045(d), an oversight finding should be raised and managed i.a.w. CAO.B.060.
145.A.40 – Equipment and tools	CAO.A.050(a)/(b) – Components, equipment and tools CAO.A.060(d) – Maintenance standard	In case of non-compliance with CAO.A.050(a)/(b) or CAO.A.060(d), an oversight finding should be raised and managed i.a.w. CAO.B.060.
145.A.42 – Components	CAO.A.050(c) – Components, equipment and tools	In case of non-compliance with CAO.A.050(c), an oversight finding should be raised and managed i.a.w. CAO.B.060.
145.A.45(a)/(b)/(e)/(f)/(g) – Maintenance data 145.A.48(d) – Performance of maintenance	CAO.A.055(a)/(b) – Maintenance data and work orders CAO.A.060(c)/(e)/(j) – Maintenance standard	<p>In case of non-compliance with CAO.A.055(a) or CAO.A.060(c)(e)(j), an oversight finding should be raised and managed i.a.w. CAO.B.060.</p> <ul style="list-style-type: none"> <li>• 145.A.45(b) requirement are applicable to Part-CAO organisation through a reference to M.A.401 and ML.A.401.</li> <li>• There is no requirement equivalent to 145.A.45(c)(d) in Part-CAO</li> </ul>
145.A.45(c)/(d) – Maintenance data	N/A – No equivalent requirement in Part-CAO	Open findings against 145.A.45(c)(d) at the time of grandfathering should be cancelled.
145.A.65(b)(1) – Safety and quality policy, maintenance procedures and quality system	CAO.A.055(b) – Maintenance data and work orders	In case of non-compliance with CAO.A.055(b), an oversight finding should be raised and managed i.a.w. CAO.B.060.
145.A.47 – Production planning	N/A – No equivalent requirement in Part-CAO	There is no requirement to produce and maintain a production planning as required by 145.A.47 in Part-CAO. However; as mention in CAO.A.035(d), the CAO shall demonstrate having sufficient appropriately qualified staff for it to be able to carry out the planned work
145.A.48(a)/(b)/(c) – Performance of maintenance	CAO.A.060(g)/(h)/(i) – Maintenance standards	In case of non-compliance with CAO.A.060(g)/(h)/(i), an oversight finding should be raised and managed i.a.w. CAO.B.060.
145.A.50(a)/(b)/(c)/(e)/(f) – Certification of maintenance	CAO.A.065 – Aircraft certificate of release to service	<p>In case of non-compliance with CAO.A.065, an oversight finding should be raised and managed i.a.w. CAO.B.060.</p> <p>Aircraft release to service requirement are different in Part-CAO compared to Part-145 (no need of “C” licensed staff, no difference between “base” and “line” maintenance, etc. Even if the organisation complies with Part-145 and CAO.A.065, the release to service procedure needs to be amended to account for these changes.</p>
145.A.50(d) – Certification of maintenance	CAO.A.070 – Component certificate of release to service	In case of non-compliance with CAO.A.070, an oversight finding should be raised and managed i.a.w. CAO.B.060.

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Potential transition findings are identified un blue		
Part-145 requirement where applicable	Part-CAO requirement	Oversight policy to be applied to grandfathered Part-CAO from 24 March 2020 to 24 September 2021
145.A.75(f) – Privileges of the organisation	CAO.A.085 – Airworthiness review CAO.A.095(c)(2) - Privileges of the organisation	In case of non-compliance with CAO.A.085, an oversight finding should be raised and managed i.a.w. CAO.B.060
145.A.55 – Maintenance and airworthiness review records	CAO.A.090(a)(1)/(a)(3)/(b)/(c)/(d)/(e)/(f)/(g)(1) – Record-keeping	In case of non-compliance with CAO.A.090(a)(1)/(a)(3)/(b)/(c)/(d)/(e)/(f)/(g)(1), an oversight finding should be raised and managed i.a.w. CAO.B.060
145.A.75(a)/(b)/(c)/(d)/(e) – Privileges of the organisation	CAO.A.095(a)(1)/(a)(2)/(a)(3)/(a)(4)/(d) – Privileges of the organisation	In case of non-compliance with CAO.A.095(a)(1)/(a)(2)/(a)(3)/(a)(4)/(d), an oversight finding should be raised and managed i.a.w. CAO.B.060.
145.A.65(a)/(b)(2)/(c) – Safety and quality policy, maintenance procedures and quality system	CAO.A.100 – Quality system and organisational review	In case of non-compliance with CAO.A.100, an oversight finding should be raised and managed i.a.w. CAO.B.060. A Part-CAO can elect to replace its quality system by an organisational review when one of the following condition is met: <ul style="list-style-type: none"> <li>• The scope of the CAO does only contain aircraft covered by Part-ML</li> <li>• The CAO does not exceed 10 full-time equivalent staff involved in maintenance</li> <li>• The CAO does not exceed 5 full-time equivalent staff involved in continuing airworthiness management</li> </ul>
145.A.85 – Changes to the approved continuing airworthiness organisation	CAO.A.105 – Changes to the organisation	Potential transition finding: “Due to on-going transition from Part-145 to Part-CAO, current exposition does not contain necessary provisions to address CAO.A.105 requirements”.  As opposed to Part-145 where approval of the exposition can optionally be performed through indirect approvals, Part-CAO mandate the organisation to have a procedure to address changes not requiring prior approval. Changes not requiring prior approval will be managed as agreed between the organisation and the authority. The organisation should develop a procedure to account for CAO.A.105 before 24 September 2021.  Until the organisation is fully compliant with Part-CAO, changes to the organisation should be managed i.a.w. the organisation current approved procedure. As a result, in case of non compliance with 145.A.85 and/or with the current procedure in place within the organisation, an oversight finding should be raised and managed i.a.w. CAO.B.060.
145.A.90 – Continued validity of approval	CAO.A.110 – Continued validity	Minor changes are made to update references and for consistency throughout the new Part-CAO. In case of non-compliance with CAO.A.110, an oversight finding should be raised and managed i.a.w. CAO.B.060.
145.A.95 - Findings	CAO.A.115 – Findings	In case of non-compliance with CAO.A.115, an oversight finding should be raised and managed i.a.w. CAO.B.060.

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Appendix VI — Comparison CAE with Part-145 MOE

Chapter	Description	Implementing rule reference	MOE chapter	MOE chapter description
<b>PART A – GENERAL DESCRIPTION</b>				
A.1	Statement by accountable manager	CAO.A.025(a)(1); CAO.A.035(a)	1.1	Corporate commitment by the accountable manager
A.2	General presentation of the organisation	CAO.A.035(a); CAO.A.100(e)	0	GENERAL ORGANISATION (Operators within the European Union)
A.3	Description and location of the facilities	CAO.A.025(a)(9); CAO.A.030	1.8	General description of the facilities at each address intended to be approved
			5.3	List of Line maintenance locations as per 145.A.75(d)
A.4	Scope of work	CAO.A.020(a); CAO.A.025(a)(2); CAO.A.095(e); Appendix I point (a)	1.9	Organisations intended scope of work
A.5	Exposition amendments and changes to the organisation	CAO.A.025(a)(11)/(c); CAO.A.105	1.10	Notification procedure to the competent authority regarding changes to the organisation’s activities/approval/location/personnel
			1.11	Exposition amendment procedures including, if applicable, delegated procedures
A.6	Procedure for alternative means of compliance	CAO.A.017		
A.7	Management personnel	CAO.A.025(a)(3); CAO.A.035(b); CAO.A.100(a)	1.3	Management personnel
			1.4	Duties and responsibilities of the management personnel
A.8	Organisation chart	CAO.A.025(a)(4)	1.5	Management organisation chart
A.9	Manpower resources	CAO.A.035(d)	1.7	Manpower resources
			2.22*	Control of manhour planning versus scheduled maintenance work
			2.28*	Production planning procedures
A.10	List of certifying staff	CAO.A.025(a)(5)	1.6	List of certifying staff, support staff and airworthiness review staff
A.11	List of staff responsible for the development and approval of AMP	CAO.A.025(a)(6)		

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Chapter	Description	Implementing rule reference	MOE chapter	MOE chapter description
A.12	List of airworthiness review staff	CAO.A.025(a)(7); CAO.A.045(d)	1.6	List of certifying staff, support staff and airworthiness review staff
A.13	List of staff responsible for the issuance of permits to fly	CAO.A.025(a)(8)		
<b>PART B – GENERAL PROCEDURES</b>				
B.1	Quality (or organisational review) system	CAO.A.100(a)/(b)/(d)/(e)/(f)	1.2*	Safety and quality policy
			3.3	Quality audit remedial action procedure
			3.10	Concession control for deviation from organisations' procedures
			3.12	Control of manufacturers' and other maintenance working teams
B.2	Audit plan (or frequency and content of organisational review)	CAO.A.100(b)/(f)	3.1	Quality audit of organisation procedures
			3.2	Quality audit of aircraft
B.3	Monitoring of maintenance contracts	CAO.A.100(b)(2)	2.10	Aircraft maintenance programme compliance
			2.11	Airworthiness directives procedure
			3.9	Aircraft or aircraft component maintenance tasks exemption process control
B.4	Qualification, assessment and training of staff	CAO.A.035(c)/(d)/(e)/(f); CAO.A.040(a); CAO.A.045(a)/(b)/(c); CAO.A.060(a)	3.4	Certifying staff and support staff qualification and training procedures
			3.6	Quality audit personnel
			3.7	Qualifying inspectors
			3.8	Qualifying mechanics
			3.11	Qualification procedure for specialised activities such as NDT welding, etc.
			3.13*	Human factors training procedure
			3.14	Competence assessment of personnel
			3.15	Training procedures for on-the-job training as per Section 6 of Appendix III to Part-66 (limited to the case where the competent authority for the Part-145 approval and for the Part-66 licence is the same).
3.16	Procedure for the issue of a recommendation to the competent authority for the issue of a Part-66 licence in			



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Chapter	Description	Implementing rule reference	MOE chapter	MOE chapter description
				accordance with 66.B.105 (limited to the case where the competent authority for the Part-145 approval and for the Part-66 licence is the same).
B.5	One-off certification authorisation	CAO.A.040(b)		
B.6	Limited certification authorisation	CAO.A.040(c)		
B.7	Subcontracting	CAO.A.095(a)(2)/(b)(3); CAO.A.100(f)	2.1	Supplier evaluation and subcontract control procedure
B.8	Maintenance data and continuing airworthiness management data	CAO.A.055(a); CAO.A.080	2.8	Maintenance instructions and relationship to aircraft/aircraft component manufacturers' instructions including updating and availability to staff
			2.13	Maintenance documentation in use and its completion
			2.27	Procedures for notification of maintenance data inaccuracies and ambiguities, to the type certificate holder
B.9	Records management and retention	CAO.A.035(e); CAO.A.040(d); CAO.A.045(e); CAO.A.050(b); CAO.A.060(j); CAO.A.075(a)/(b)(9); CAO.A.090; CAO.A.100(c); CAO.A.085	2.13	Maintenance documentation in use and its completion
			2.14	Technical record control
			2.17	Records for the operator
			2.21	Control of computer maintenance record systems
			2.29	Airworthiness review procedures and records for ELA1 aircraft not involved in commercial operations
			L2.4	Line procedure for completion of technical log
			3.5	Certifying staff and support staff records
			4.2	Operator procedures and paperwork
			4.3	Operator record completion
6	OPERATORS MAINTENANCE PROCEDURES			
B.10	Carrying out the airworthiness review	CAO.A.085; CAO.A.095(c)	2.29	Airworthiness review procedures and records for ELA1 aircraft not involved in commercial operations
B.11	Conformity with approved flight conditions	CAO.A.095(d)		
B.12	Issue of the permit to fly	CAO.A.095(d); CAO.A.045(a)		
<b>PART C – MAINTENANCE PROCEDURES</b>				
C.1	Maintenance - general	CAO.A.025(10)	2.26*	Shift/task handover procedures
			3.12	Control of manufacturers' and other maintenance working teams

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Chapter	Description	Implementing rule reference	MOE chapter	MOE chapter description
C.2	Work order acceptance	CAO.A.055(b)	4.1	Contracting operators
			6	OPERATORS MAINTENANCE PROCEDURES
C.3	Components, equipment, tools and material (supply, acceptance, segregation, storage, calibration...)	CAO.A.050; CAO.A.060(d); CAO.A.030(b)	2.1	Supplier evaluation and subcontract control procedure
			2.2	Acceptance/inspection of aircraft components and material from outside contractors
			2.3	Storage, tagging and release of aircraft components and material to aircraft maintenance
			2.4	Acceptance of tools and equipment
			2.5	Calibration of tools and equipment
			2.19	Return of defective aircraft components to store
			2.20	Defective components to outside contractors
			L2.1	Line maintenance control of aircraft components, tools, equipment, etc.
			L2.5	Line procedure for pooled parts and loan parts
			L2.6	Line procedure for return of defective parts removed from aircraft
C.4	Maintenance facility (selection, organisation, cleanliness and environmental limitations)	CAO.A.060(b)/(e)/(f)	2.7	Cleanliness standards of maintenance facilities
C.5	Maintenance accomplishment and maintenance standards	CAO.A.095(a)(1); CAO.A.060(c); Appendix I points (b)/(c)/(d)	2.6	Use of tooling and equipment by staff (including alternate tools)
			2.9	Repair procedure
			2.10	Aircraft maintenance programme compliance
			2.11	Airworthiness directives procedure
			2.12	Optional modification procedure
			2.16	Release to service procedure
C.6	Prevention of maintenance error	CAO.A.060(g)/(i)	2.25	Procedures to detect and rectify maintenance errors.
C.7	Critical maintenance tasks and error-capturing method	CAO.A.060(h)	2.23	Critical maintenance tasks and error-capturing methods
			L2.7	Line procedure for critical maintenance tasks and error-capturing methods
C.8	Fabrication	CAO.A.020(c)		
C.9	Certifying staff responsibilities and maintenance release		2.11	Airworthiness directives procedure
			2.16	Release to service procedure

## GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO

Chapter	Description	Implementing rule reference	MOE chapter	MOE chapter description
		CAO.A.040(a); CAO.A.065; CAO.A.070; CAO.A.095(a)(4)	L2.4	Line procedure for completion of technical log
			4.2	Operator procedures and paperwork
			6	OPERATORS MAINTENANCE PROCEDURES
C.10	Defects arising during maintenance	CAO.A.075(b)(6)	2.15	Rectification of defects arising during base maintenance
			2.18	Reporting of defects to the competent authority / operator / manufacturer
			L2.3	Line maintenance control of defects and repetitive defects
C.11	Maintenance away from approved location	CAO.A.095(a)(3)		
C.12	Procedure for component maintenance under aircraft or engine rating	Appendix I point (b)/(c)		
C.13	Procedure for maintenance on installed engine (or component) under engine (or component) rating	Appendix I point (c)/(d)		
C.14	Special procedures (specialised tasks, NDT, engine running...)	CAO.A.030(a); Appendix I point (e)	2.9	Repair procedure
			2.24	Reference to specific maintenance procedures such as - — Engine running procedures — Aircraft pressure run procedures — Aircraft towing procedures — Aircraft taxiing procedures
			L2.2	Line maintenance procedures related to servicing/fuelling/de-icing, including inspection for/removal of de-icing/anti-icing fluid residues, etc.
C.15	Issue of ARC under maintenance privilege	CAO.A.095(c)(2)	2.29	Airworthiness review procedures and records for ELA1 aircraft not involved in commercial operations
<b>PART E – SUPPORTING DOCUMENTS</b>				
E.1	Sample documents		5.1	Sample of documents
			2.13	Maintenance documentation in use and its completion
E.2	List of subcontracted organisations		5.2	List of Subcontractors as per 145.A.75(b)
E.3	List of organisation contracted by the CAO		5.4	List of contracted organisations as per 145.A.70(a)(16)
E.4	Aircraft technical log system (if applicable)			
E.5	List of the currently approved alternative means of compliance			
E.6	Copy of contracts for subcontracted continuing airworthiness tasks			

## GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO

\*: these elements are not explicitly required by Part-CAO, but if associated procedures already exist in the organisation that transitions to Part-CAO, it is recommended to integrate them in the CAE under the chapter indicated.

GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO

Appendix VII — Comparison CAE with Part-MF MOM (small organisation)

Chapter	Description	Implementing rule reference	MOM small org. chapter	MOM (small org.) chapter description (Appendix IV to AMC M.A.604)
<b>PART A – GENERAL DESCRIPTION</b>				
A.1	Statement by accountable manager	CAO.A.025(a)(1); CAO.A.035(a)	Part A	Accountable manager statement
A.2	General presentation of the organisation	CAO.A.035(a); CAO.A.100(e)	Part B	Description — General presentation of the organisation
A.3	Description and location of the facilities	CAO.A.025(a)(9); CAO.A.030	Part B	Description — Organisation’s scope of work — Identification of the level of work which can be performed at each facility. — General description of the facility
			Part E	Appendices — List of maintenance locations.
A.4	Scope of work	CAO.A.020(a); CAO.A.025(a)(2); CAO.A.095(e); Appendix I point (a)	Part B	Description — Organisation’s scope of work
A.5	Exposition amendments and changes to the organisation	CAO.A.025(a)(11)/(c); CAO.A.105	Part A	Amendment procedure
			Part D	Working Procedures — Management of indirect approval of the manual
A.6	Procedure for alternative means of compliance	CAO.A.017		
A.7	Management personnel	CAO.A.025(a)(3); CAO.A.035(b); CAO.A.100(a)	Part B	Description — Name and title of management personnel
A.8	Organisation chart	CAO.A.025(a)(4)	Part B	Description — Organisation chart
A.9	Manpower resources	CAO.A.035(d)	Part B	Description

## GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO

Chapter	Description	Implementing rule reference	MOM small org. chapter	MOM (small org.) chapter description (Appendix IV to AMC M.A.604)
				<ul style="list-style-type: none"> <li>— Personnel                             <ul style="list-style-type: none"> <li>— Technical personnel (number, qualifications and experience)</li> <li>— Administrative personnel (number)</li> </ul> </li> </ul>
A.10	List of certifying staff	CAO.A.025(a)(5)	Part B	Description <ul style="list-style-type: none"> <li>— Certifying staff and airworthiness review staff</li> </ul>
A.11	List of staff responsible for the development and approval of AMP	CAO.A.025(a)(6)		
A.12	List of airworthiness review staff	CAO.A.025(a)(7); CAO.A.045(d)	Part B	Description <ul style="list-style-type: none"> <li>— Certifying staff and airworthiness review staff</li> </ul>
A.13	List of staff responsible for the issuance of permits to fly	CAO.A.025(a)(8)		
<b>PART B – GENERAL PROCEDURES</b>				
B.1	Quality (or organisational review) system	CAO.A.100(a)/(b)/(d)/(e)/(f)	Part C	General Procedures <ul style="list-style-type: none"> <li>— Organisational review</li> </ul>
B.2	Audit plan (or frequency and content of organisational review)	CAO.A.100(b)/(f)	Part C	General Procedures <ul style="list-style-type: none"> <li>— Organisational review                             <ul style="list-style-type: none"> <li>— Organisation, frequency, scope and content (including processing of authority’s findings)</li> <li>— Planning and performance of the review</li> </ul> </li> </ul>
B.3	Monitoring of maintenance contracts	CAO.A.100(b)(2)		
B.4	Qualification, assessment and training of staff	CAO.A.035(c)/(d)/(e)/(f); CAO.A.040(a); CAO.A.045(a)/(b)/(c); CAO.A.060(a)	Part B	Description <ul style="list-style-type: none"> <li>— Personnel                             <ul style="list-style-type: none"> <li>— Technical personnel (number, qualifications and experience)</li> </ul> </li> </ul>
			Part C	General Procedures <ul style="list-style-type: none"> <li>— Training</li> </ul>
B.5	One-off certification authorisation	CAO.A.040(b)	Part C	General Procedures <ul style="list-style-type: none"> <li>— One time authorisations</li> </ul>
B.6	Limited certification authorisation	CAO.A.040(c)		
B.7	Subcontracting	CAO.A.095(a)(2)/(b)(3); CAO.A.100(f)	Part C	General Procedures <ul style="list-style-type: none"> <li>— Training</li> </ul>

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Chapter	Description	Implementing rule reference	MOM small org. chapter	MOM (small org.) chapter description (Appendix IV to AMC M.A.604)
B.8	Maintenance data and continuing airworthiness management data	CAO.A.055(a); CAO.A.080	Part C	General Procedures — Subcontracting of specialised services
B.9	Records management and retention	CAO.A.035(e); CAO.A.040(d); CAO.A.045(e); CAO.A.050(b); CAO.A.060(j); CAO.A.075(a)/(b)(9); CAO.A.090; CAO.A.100(c); CAO.A.085	Part D	Working Procedures — Records
B.10	Carrying out the airworthiness review	CAO.A.085; CAO.A.095(c)	Part D	Working Procedures — Airworthiness review procedures and records for ELA1 aircraft not involved in commercial operations
B.11	Conformity with approved flight conditions	CAO.A.095(d)		
B.12	Issue of the permit to fly	CAO.A.095(d); CAO.A.045(a)		
<b>PART C – MAINTENANCE PROCEDURES</b>				
C.1	Maintenance - general	CAO.A.025(10)	Part D	Working Procedures — Occurrence reporting
C.2	Work order acceptance	CAO.A.055(b)	Part D	Working Procedures — Work order acceptance — Preparation and issue of the work package — Control of the work order
C.3	Components, equipment, tools and material (supply, acceptance, segregation, storage, calibration...)	CAO.A.050; CAO.A.060(d); CAO.A.030(b)	Part B	Description — Tools, equipment and material
			Part D	Working Procedures — Logistics — Execution — Procedures for accepting components from stores including eligibility check

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Chapter	Description	Implementing rule reference	MOM small org. chapter	MOM (small org.) chapter description (Appendix IV to AMC M.A.604)
				— Procedures for returning unserviceable components to stores
C.4	Maintenance facility (selection, organisation, cleanliness and environmental limitations)	CAO.A.060(b)/(e)/(f)		
C.5	Maintenance accomplishment and maintenance standards	CAO.A.095(a)(1); CAO.A.060(c); Appendix I points (b)/(c)/(d)	Part D	Working Procedures — Preparation and issue of the work package — Preparation of the planned work — Work package content (copy of forms, work cards, procedure for their use, distribution) — Responsibilities and signatures needed for the authorisation of the work — Execution
C.6	Prevention of maintenance error	CAO.A.060(g)/(i)		
C.7	Critical maintenance tasks and error-capturing method	CAO.A.060(h)		
C.8	Fabrication	CAO.A.020(c)		
C.9	Certifying staff responsibilities and maintenance release	CAO.A.040(a); CAO.A.065; CAO.A.070; CAO.A.095(a)(4)	Part D	Working Procedures — Release to Service – Certifying staff — Release to Service – Supervision — Release to Service – Certificate of release to service
C.10	Defects arising during maintenance	CAO.A.075(b)(6)		
C.11	Maintenance away from approved location	CAO.A.095(a)(3)		
C.12	Procedure for component maintenance under aircraft or engine rating	Appendix I point (b)/(c)		
C.13	Procedure for maintenance on installed engine (or component) under engine (or component) rating	Appendix I point (c)/(d)		
C.14	Special procedures (specialised tasks, NDT, engine running...)	CAO.A.030(a); Appendix I point (e)	Part D	Working Procedures — Special procedures
C.15	Issue of ARC under maintenance privilege	CAO.A.095(c)(2)		
<b>PART E – SUPPORTING DOCUMENTS</b>				
E.1	Sample documents		Part E	Appendices



**GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO**

Chapter	Description	Implementing rule reference	MOM small org. chapter	MOM (small org.) chapter description (Appendix IV to AMC M.A.604)
				— Sample of all documents used
E.2	List of subcontracted organisations		Part E	Appendices — List of subcontracted specialised services
E.3	List of organisation contracted by the CAO		Part E	Appendices — List of Part-145 or M.A. Subpart F organisations
E.4	Aircraft technical log system (if applicable)			
E.5	List of the currently approved alternative means of compliance			
E.6	Copy of contracts for subcontracted continuing airworthiness tasks			

GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO

Appendix VIII — Comparison CAE with Part-MG CAME

Chapter	Description	Implementing rule reference CAO	CAME chapter	CAME description (Appendix V to AMC M.A.704)
<b>PART A – GENERAL DESCRIPTION</b>				
A.1	Statement by accountable manager	CAO.A.025(a)(1); CAO.A.035(a)	0.1	Corporate commitment by the accountable manager
A.2	General presentation of the organisation	CAO.A.035(a); CAO.A.100(e)	0.2	General information
A.3	Description and location of the facilities	CAO.A.025(a)(9); CAO.A.030	0.2	General information
A.4	Scope of work	CAO.A.020(a); CAO.A.025(a)(2); CAO.A.095(e); Appendix I point (a)	0.2(c)	General information - Scope of work — Aircraft managed
A.5	Exposition amendments and changes to the organisation	CAO.A.020(a)(1)&(2); CAO.A.025(a)(11)/(c); CAO.A.105	0.5	Procedure to notify the competent authority of changes to the organisation’s activities/approval/location/personnel
			0.6	Exposition amendment procedures
A.6	Procedure for alternative means of compliance	CAO.A.017		
A.7	Management personnel	CAO.A.025(a)(3); CAO.A.035(b); CAO.A.100(a)	0.3	Management personnel
A.8	Organisation chart	CAO.A.025(a)(4)	0.4	Management organisation chart
A.9	Manpower resources	CAO.A.035(d)	0.3(e)(1)	Management personnel - Manpower resources
A.11	List of staff responsible for the development and approval of AMP	CAO.A.025(a)(6)		
A.12	List of airworthiness review staff	CAO.A.025(a)(7); CAO.A.045(d)	5.2	List of airworthiness review staff
A.13	List of staff responsible for the issuance of permits to fly	CAO.A.025(a)(8)	4B.3	Permit to fly authorised signatories
<b>PART B – GENERAL PROCEDURES</b>				

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Chapter	Description	Implementing rule reference CAO	CAME chapter	CAME description (Appendix V to AMC M.A.704)
B.1	Quality (or organisational review) system	CAO.A.100(a)/(b)/(d)/(e)/(f)	2.1	Continuing airworthiness quality policy, plan and audit procedure
			2.2	Monitoring of continuing airworthiness management activities
			2.3	Monitoring of the effectiveness of the maintenance programme(s)
			2.4	Monitoring that all maintenance is carried out by an appropriate maintenance organisation
B.2	Audit plan (or frequency and content of organisational review)	CAO.A.100(b)/(f)	2.1	Continuing airworthiness quality policy, plan and audit procedure
B.3	Monitoring of maintenance contracts	CAO.A.100(b)(2)	2.5	Monitoring that all contracted maintenance is carried out in accordance with the contract, including subcontractors used by the maintenance contractor
B.4	Qualification, assessment and training of staff	CAO.A.035(c)/(d)/(e)/(f); CAO.A.040(a); CAO.A.045(a)/(b)/(c); CAO.A.060(a)	2.6	Quality audit personnel
			4.1	Airworthiness review staff
			4B.3	Permit to fly authorised signatories
B.7	Subcontracting	CAO.A.095(a)(2)/(b)(3); CAO.A.100(f)	2.2	Monitoring of continuing airworthiness management activities
B.8	Maintenance data and continuing airworthiness management data	CAO.A.055(a); CAO.A.080		
B.9	Records management and retention	CAO.A.035(e); CAO.A.040(d); CAO.A.045(e); CAO.A.050(b); CAO.A.060(j); CAO.A.075(a)/(b)(9); CAO.A.090; CAO.A.100(c); CAO.A.085	1.3	Time and continuing airworthiness records, responsibilities, retention and access
			4.2	Review of aircraft records
			4.7	Airworthiness review records, responsibilities, retention and access
			4B.5	Permit to fly records, responsibilities, retention and access
			1.1	Aircraft continuing airworthiness record system utilisation
B.10	Carrying out the airworthiness review	CAO.A.085; CAO.A.095(c)	4.3	Physical survey

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Chapter	Description	Implementing rule reference CAO	CAME chapter	CAME description (Appendix V to AMC M.A.704)
B.11	Conformity with approved flight conditions	CAO.A.095(d)	4B.1	Conformity with approved flight conditions
B.12	Issue of the permit to fly	CAO.A.095(d); CAO.A.045(a)	4B.2	Issue of the permit to fly under the CAMO privilege
			4B.4	Interface with the local authority for the flight
<b>PART D – CONTINUING AIRWORTHINESS MANAGEMENT PROCEDURES</b>				
D.1	Continuing airworthiness management - general	CAO.A.025(10); CAO.A.095(b)(1); CAO.A.075(a)/(b)(7)/(b)(9)	1.9	Engineering activity
D.2	MEL (and CDL) application	CAO.A.075(a)	1.1	Aircraft technical log utilisation and MEL application
D.3	AMP development, control and periodic review	CAO.A.075(a)/(b)(1)/(b)(2); CAO.A.095(b)(2)	1.2	Aircraft maintenance programmes — development amendment and approval
			1.5	Analysis of the effectiveness of the maintenance programme(s)
			1.10	Reliability programmes
D.4	Airworthiness directives and other mandatory airworthiness requirements	CAO.A.075(a)/(b)(5)/(b)(8)	1.4	Accomplishment and control of airworthiness directives
D.5	Modifications and repairs	CAO.A.075(b)(3)	1.6 *	Non-mandatory modification embodiment policy
			1.7	Major repair and modification standards
D.6	Pre-flight inspection	CAO.A.075(a)	1.11	Pre-flight inspections
D.7	Defects	CAO.A.075(b)(6)	1.8	Defect reports
D.8	Establishment of contracts and work orders for the maintenance	CAO.A.075(a)/(b)(4)/(b)(7)	3.1	Maintenance contractor selection procedure
D.9	Coordination of maintenance activities	CAO.A.075(b)(8)	2.4	Monitoring that all maintenance is carried out by an appropriate maintenance organisation
			2.5	Monitoring that all contracted maintenance is carried out in accordance with the contract, including subcontractors used by the maintenance contractor
D.10	Mass and balance statement	CAO.A.075(a)/(b)(10)	1.12	Aircraft weighing
D.11	Issue of ARC or ARC recommendation	CAO.A.095(c)(1)(i)	4.3	Physical survey

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Chapter	Description	Implementing rule reference CAO	CAME chapter	CAME description (Appendix V to AMC M.A.704)
			4.4	Additional procedures for recommendations to competent authorities for the import of aircraft
			4.5	Recommendations to competent authorities for the issue of ARC
			4.6	Issue of ARC
D.12	ARC extension	CAO.A.095(b)(4)/(c)(1)(ii)	4.6	Issue of ARC
D.13	Maintenance check flights	CAO.A.075(a)	1.13	Check flight procedures
<b>PART E – SUPPORTING DOCUMENTS</b>				
E.1	Sample documents		5.1	Sample documents
E.2	List of subcontracted organisations		5.3	List of subcontractors as per M.A.711(a)(3)
E.3	List of organisation contracted by the CAO		5.4	List of contracted approved maintenance organisations
E.4	Aircraft technical log system (if applicable)		1.1	Aircraft technical log utilisation and MEL application
E.5	List of the currently approved alternative means of compliance			
E.6	Copy of contracts for subcontracted continuing airworthiness tasks		5.5	Copy of contracts for subcontracted work (Appendix II to AMC M.A.711(a)(3))

\*: these elements are not explicitly required by Part-CAO, but if associated procedures/document already exist in the organisation that transitions to Part-CAO, it is recommended to integrate them in the CAE under the chapter indicated.