

GUIDE FOR TRANSITION TO PART-CAO and PART-CAMO (Revision January 2020)

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"> • aeroplanes equipped with a turbine engine (in the case of aircraft-rated organisations); • helicopters equipped with a turbine engine or with more than one piston engine (in the case of aircraft-rated organisations); • complete piston engines of 450 HP and above (in the case of engine-rated organisations); and • complete turbine engines (in the case of engine-rated organisations). <p>Current Part-145 organisation being in one of the above situation cannot be grandfathered as a Part-CAO.</p>

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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"> • The CAE is made of the 4 following parts: <ul style="list-style-type: none"> ○ Part A – General description ○ Part B - General procedures ○ Part C – Maintenance procedures ○ Part D – Continuing airworthiness management procedures ○ Part E – Supporting documents • 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"> ○ A table comparing CAE with Part-145 exposition is available in annex 4-2, and ○ 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. <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)/(j)(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 different from 145.A.30(k) (as amended by Reg. (EU) 2020/XXXX and coming from the former M.A.901(l)(1)) but are 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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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"> • 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; • 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. <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"> • 145.A.45(b) requirement are applicable to Part-CAO organisation through a reference to M.A.401 and ML.A.401. • There is no requirement equivalent to 145.A.45(c)/(d) in Part-CAO
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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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"> • The scope of the CAO does only contain aircraft covered by Part-ML • The CAO does not exceed 10 full-time equivalent staff involved in maintenance • The CAO does not exceed 5 full-time equivalent staff involved in continuing airworthiness management
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.