

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

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

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.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"> • 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-MF organisation being in one of the above situation cannot be grandfathered as a Part-CAO.</p>

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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"> • 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-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"> ○ A table comparing CAE with Part-MF manual is available in annex 3-2, 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 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 different from M.A.606(i) (as amended by Reg. (EU) 2020/XXXX and coming from the former M.A.901(l)(1)) but are 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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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)/(a)(2)/(a)(3)/(a)(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"> • 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
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.