# Part M Continuing Airworthiness managements Organization

#### Aircraft Definitions



#### **Learning Outcomes**

By the end of this session, delegates will be able to:

- Discuss Part M Section A procedures
- List the components of Subpart F Maintenance organization approval
- List the components of Subpart G Continuing Airworthiness Management approval
- Describe The 'Controlled Environment'
- Discuss Airworthiness Review Certificates (ARC)

#### Large aircraft

Means an aeroplane with a max take-off mass (MTOM) of more than 5700Kg or a multi-engined helicopter

#### **Article 2 – Definitions**

### European Light Aircraft 1 (ELA) aircraft means any of the following aircraft.

- An aeroplane, sailplane or powered sailplane, non complex aircraft, with MTOM less than 1200 Kg
- A balloon with a max design lifting gas or hot air volume of not more than:
  - 3400 m3 for hot air balloons
  - 1050 m3 for gas balloons
  - 300 m3 for tethered gas balloons.
- An airship designed for not more than two persons and a max design lifting gas or hot-air volume of not more than:
  - 2500 m3 for hot-air airships
  - ■1000 m3 for gas airships.

#### **Article 2 – Definitions**

## Light Sport Aircraft(LSA) aircraft means any of the following aircraft:

- a Maximum Take-off Mass (MTOM) of not more than 600 kg, and a
- maximum stalling speed in the landing configuration (VS0) of not more than 45 knots Calibrated Airspeed (CAS) at the aircraft's maximum certificated takeoff mass and most critical centre of gravity, and
- a maximum seating capacity of no more than two persons, including the pilot, and
- a single, non-turbine engine fitted with a propeller, and
- ■a non-pressurised cabin.

#### **Definitions EC 216/2008**

# Complex motor powered aircraft Aeroplane

- MTOM > 5700Kgs, or
- >19 Passengers, or
- Minimum Crew at least 2 pilots or
- Equipped with turbojet(s) or more than one turboprop.

#### Helicopter

- MTOM > 3175Kg or
- >9 Passengers or
- ■Minimum Crew at least 2 pilots

#### EC) No 2042/2003, Article 2 - Definitions

#### Principle place of business

means the head office or the registered office of the undertaking within which the principal financial functions and operational control of the activities referred to in this Regulation are exercised.

#### **Continuing Airworthiness**

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

#### Part M – Section A

- Subpart A General
- Subpart B Accountability
- Subpart C Continuing Airworthiness
- Subpart D Maintenance Standards \*
- Subpart E Components \*
- Subpart F Maintenance organization
- Subpart G Continuing Airworthiness
   Management organization
- Subpart H Certificate of Release to Service \*
- Subpart I Airworthiness Review Certificate

# Subpart B Accountability

#### Responsibilities

The owner / operator is responsible for the continuing airworthiness of an aircraft and shall ensure that no flight takes place unless:

- 1) The aircraft is maintained in an airworthy condition; and
- 2) Any operational, emergency equipment systems fitted are correctly installed and serviceable or clearly identified as unserviceable; and
- 3) The airworthiness review certificate remains valid; and
- 4) All aircraft maintenance is performed in accordance with the Approved Maintenance program.

#### Responsibilities

When the aircraft is leased, the responsibilities of the owner are transferred to the lessee if:

- 1) The lessee is stipulated on the registration document, or;
- 2) Detailed in the leasing contract.

For info ICAO Annex 6, Part II, Chapter 2.6, subparagraph 2. 1.2 states:

'The owner or lessee shall not operate the aeroplane unless it is maintained

and released to service under a system acceptable to the state of registry

#### Responsibilities (non-CAT, non-large A/C)

- 1) Contract the tasks associated with CAW to a CAMO in accordance with Appendix 1.
  - 2) Have a limited contract with a CAMO for the development of the AMP. (NOT a controlled environment)
- 3) Manage all CAW tasks for the aircraft themselves (NOT a Controlled environment).

Responsibilities

Owners of Large aircraft (non-CAT), must contract a CAMO to manage the CAW of their aircraft. (Written contract iaw Appendix 1)

Responsibilities Maintenance of large aircraft, aircraft used for commercial air transport and their components shall be carried out by a Part-145 approved maintenance organization.

- Responsibilities
- For holders of an Air Operators
- Certificate (AOC)
- 1) Must be approved to Part M subpart
- G, for the aircraft it operates (as part of the AOC)
- 2) Be approved to Part 145 or have a contract with one

- An AOC operator may sub-contract limited Continuing Airworthiness tasks to another person of organization
- The operator remains responsible
- Considered as an internal part of the operators
   Quality
  - System
- Sub-contract arrangement in accordance with Appendix II

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#### Occurrence Reporting

Any person or organization responsible under M.A.201 shall report any identified condition of an aircraft or component which endangers flight safety to the following:

- i) Competent authority of the state of registry
- ii) TC / STC holder
- iii) Member state of operator
- iv) Report to the owner, the operator or managing CAMO Reports shall be made as soon as practical but within 72

hours. Refer to AMC 20-8 for guidance

The aircraft CAW and the serviceability of both operational and emergency equipment shall be ensured by:

- 1) The accomplishment of pre-flight inspections
- 2) The rectification of any defect and damage affecting safe operation (For CAT & Large A/C taking into account the MEL)
- 3) The accomplishment of all maintenance, in accordance with the <u>approved</u> Aircraft Maintenance program (AMP)
- 4)For CAT & Large A/C, the analysis of the effectiveness of the AMP

- 5) The accomplishment of any applicable:
  - i. Airworthiness Directive(EASA, State of design, AirframeEngine, Propeller, Equipment
  - ii. Any Operational directive with a continuing airworthiness impact
  - iii. Continued airworthiness requirement established by the EASA (CMR, ALI, CDCCL)
  - iv. Measures mandated by the competent authority in immediate reaction to a safety problem

- 6) The accomplishment of modifications and repairs in accordance with Part 21
- 7) For non-mandatory modifications and/or inspections, the establishment of an embodiment policy
- 8) Maintenance check flights when necessary

#### **Modifications and Repairs**

ICAO Annex 6, Part II, Chapter 2.6, subparagraph 2.6.3, states:

'All modifications and repairs shall comply with airworthiness requirements acceptable to the state of registry. Procedures shall be established to ensure that the substantiating data supporting compliance with the airworthiness requirements is retained

The approved Aircraft Maintenance program (AMP) must establish compliance with:

a) Instructions issued by the competent authority, b) Instructions for CAW (ICAW) issued by TC, Restricted TC and STC holders, major repair design approval, ETSO authorisation and any other relevant approval holder that publishes such data

The approved Aircraft Maintenance program (AMP) must establish compliance with:

c) Additional or alternative instructions raised by the owner or continuing airworthiness management organization if approved by Competent Authority

#### Content of AMP (cont)

- This may include:
- Lubrication tasks
- Inspection tasks (E.G: GVI, DVI or NDT)
- Component tasks
- Operational /Functional checks
- Life limitations

#### Aircraft Maintenance program

Note: In the future an amendment to Part M will require the AMP to include Human Factors principles

# ICAO Annex 6, Part II, Chapter 2.6, subparagraph 2.6.1.4, states:

'The owner or the lessee shall ensure that the maintenance of the aeroplane is performed in accordance with a maintenance program acceptable to the state of registry'

The aircraft CAW records shall consist of, as appropriate,

- i. An aircraft logbook
- ii. Engine logbook(s) or engine module log cards,
- iii. Propeller logbook(s)
- iv. Log cards for any service life limited component
- v.The operator's technical log (for CAT)

The aircraft continuing airworthiness records shall contain the current:

- Status of ADs and measures mandated in immediate reaction to a safety problem
- ii. Status of modifications and repairs
- iii. Status of compliance with the AMP
- iv. Status of service life limited components
- v. Mass and balance report
- vi.List of deferred maintenance and any associated limitations, as appropriate

Aircraft Continuing Airworthiness Records System

Record retention periods will depend on the type of record, but typically this is two years after permanent withdrawal of the aircraft from service

This exceeds the ICAO Annex 6, Part II, Chapter 2.6, subparagraph 2.6.2.2 requirement for a minimum retention period of 90 days after the aircraft to which they refer has been permanently withdrawn from service

Transfer of Aircraft Continuing Airworthiness Records

The owner or operator shall ensure when an aircraft is permanently transferred from one owner or operator to another that the M.A.305 continuing airworthiness records and, if applicable, M.A.306 operator's technical log are also transferred.

This aligns with the ICAO Annex 6, Part II, Chapter 2.6, subparagraph 2.6.2.3 requirement

# Subpart F Maintenance organization Approval



#### **Appendix IV – Approval Ratings**

Subpart F approval class ratings

- A2 Aeroplanes 5700 Kg and below
- A3 Single Engine Helicopters
- A4 Aircraft other than A1, A2 or A3
- B1 Turbine Engines
- B2 Piston Engines
- B3 APUs
- C1 to C22 Components
- D1 NDT

#### **Maintenance organization**

- 1) A Facility
- 2) Management Structures
- 3) Maintenance Data
- 4) Equipment to carry out the Approved Tasks
- 5) Maintenance Personnel
- 6) Certifying Staff
- 7) Procedures
- 8) Monitoring System
- 9) Maintenance organization Manual (MOM)

#### Scope

Applicable to non Commercial Air Transport and 'Non Large' aircraft and the associated components.





#### Which is the odd one out?





## Part M Subpart F Maintenance organization

## **Extent of Approval**

- 1) Scope of work on Approval Certificate
- 2) More clearly defined detail in Maintenance organization

  Manual
- 3) Fabrication of a restricted range of parts (AMC M.A. 603b) if applicable, will also be identified within the MOM

#### Part M Subpart F Maintenance organization

#### organizational Review

What is the objective of an 'organizational review'?

- To enable the organization to deliver a safe product.
- To ensure the approved maintenance organization
- remains in compliance with requirements.
- Procedures required in MOM

Similar to a quality audit, but no requirement for independence of the person carrying out the review

## The EASA Form 1 constitutes the component certificate of release to service.

Approving Competent Authority     Country				FORM 1	3. Form Tracking Number
4. Organisation Name and Address:					5. Work Order/Contract/Invoice
6. Item	7. Description	8. Part No.	9. Qty.	10. Serial No.	11. Status/Work
12. Remarks					
13a. Certifies that the items identified above were manufactured in conformity to:  approved design data and are in a condition for safe operation non-approved design data specified in block 12				14a. □ Part-145.A.50 Release to Service □ Other regulation specified in block 12 Certifies that unless otherwise specified in block 12, the work identified in block 11 and described in block 12, was accomplished in accordance with Part-145 and in respect to that work the items are considered ready for release to service.	
13b. Authorised Signature		13c. Approval/ Authorisation Number		14b. Authorised Signature	14c. Certificate/Approval Ref. No.
13d. Name		13e. Date (dd mmm yyyy)		14d. Name	14e. Date (dd mmm yyyy)

#### USER/INSTALLER RESPONSIBILITIES

This certificate does not automatically constitute authority to install the item(s).

Where the user/installer performs work in accordance with regulations of an airworthiness authority different than the airworthiness authority specified in block 1, it is essential that the user/installer ensures that his/her airworthiness authority accepts items from the airworthiness authority specified in block 1.

Statements in blocks 13a and 14a do not constitute installation certification, in all cases aircraft maintenance records must contain an installation certification issued in accordance with the national regulations by the user/installer before the aircraft may be flown.

# SUBPART G Continuing Airworthiness Management organization Approval

- Continuing Airworthiness Management Exposition (CAME)
- 2) Facilities
- 4) Airworthiness review staff
- 5) Continuing airworthiness management
- 6) Documentation
- Airworthiness review
- 8) Privileges of the organization
- 9) Quality System
- 10) Changes to the organization
- 11) Record keeping

- Continuing Airworthiness Management Exposition
- The CAME contains 6 parts
- Part 0 General organization (Including corporate commitment)
- Part 1 Continuing Airworthiness Management Procedures
- Part 2 Quality System
- Part 3 Contracted Maintenance
- Part 4A Airworthiness Review Procedures (if applicable)
- Part 4B Permit to Fly Procedures (if applicable)
- Part 5 Appendices

**Facilities** The CAMO shall provide suitable office accommodation at appropriate locations



## Personnel Requirements

- 1) Accountable Manager
- 2) Management personnel.
- 3) For CAT, a 'nominated post holder' responsible for management and supervision of CAW activities
- 4) The nominated post holder should not be employed by the Part 145 unless specifically agreed by the CAA
- 5) Have sufficient appropriately qualified staff

Personnel Requirements (continued)

- 6) All persons shall be able to show relevant knowledge, background and appropriate experience relating to aircraft CAW
- 7) Records of qualifications of all personnel
- 8) organizations extending Airworthiness Review Certificates shall nominate persons authorised to do so (subject to CAA approval)
- 9) For all 'Large Aircraft' and aircraft used for commercial air transport, a competence assessment of personnel

Accountable Manager

Commercial

Nominated Quality

Contracts

Technical Records

**Planning** 

Airframe

**Engines** 

**Avionics** 

Airworthiness Review Staff To be approved to carry out airworthiness reviews and if applicable issue permits to fly, an approved CAMO shall have appropriate airworthiness review staff (accepted by the CA) to issue ARCs or make recommendations and if applicable issue permits to fly

Airworthiness Review Staff (continued)

- 1) Airworthiness Review staff shall be appropriately qualified (Part 66 license / Degree or equivalent).
- 2) Additional experience may be used in place of formal qualifications
- 3) A knowledge of a relevant sample of aircraft types on the approval
- 4)Hold a position in the organization with appropriate responsibilities

- Airworthiness Review Staff (continued)
- 5) Be independent of or in overall control of the CAW
  - management processes
- 6) Authorization based on carrying out an Airworthiness
  - Review under supervision
- 7) Renewal of authorization dependent on continued experience
- 8) All AR staff accepted by CA and named in CAME

Continuing Airworthiness Management

All continuing airworthiness management shall be carried out according to the prescriptions of M.A. Subpart C.

For every aircraft managed, the CAMO shall:

- Develop and control a maintenance program for the aircraft managed including any applicable reliability program;
- 2)Present the aircraft maintenance program and its amendments to the competent authority for approval (unless covered by an Indirect approval procedure)

Continuing Airworthiness Management (continued)

- 3) Manage the approval of modification and repairs
- 4) Ensure that all maintenance is carried out in accordance with the approved maintenance program and released in accordance with Subpart H
- 5) Ensure that all applicable airworthiness directives and operational directives with a continuing airworthiness impact, are applied
- 6)Ensure that all defects discovered during scheduled maintenance or reported are corrected by an appropriately approved maintenance organization

Continuing Airworthiness Management (continued)

- 7) Ensure that the aircraft is taken to an appropriately approved maintenance organization whenever necessary
- 8) Co-ordinate scheduled maintenance, the application of or airworthiness directives, the replacement of service life limited parts, and component inspection to ensure the work is carried out properly
- 9) Manage and archive all continuing airworthiness records and the operator's technical log
- 10) Ensure that the mass and balance statement reflects the current status of the aircraft

#### **Documentation**

The CAMO shall hold and use applicable current maintenance data for the performance of continuing airworthiness management tasks.

This data may be provided by the owner or the operator, subject to an appropriate contract being established.



## **Documentation (continued)**

In order to gain the approval without having any contracted customers, the organization should develop Baseline or Generic maintenance programs for each type on the approval.

- Airworthiness Review
- To ensure the validity of the airworthiness certificate, an AR shall be carried out periodically.
- A) Review of aircraft records
- B) Physical survey of aircraft

Airworthiness Review

A full documented review of the aircraft records to be satisfied that:

- 1) airframe, engine and propeller log books, tech Log and;
- 2) the flight manual
- 3) all due maintenance has been carried out in accordance with AMP
- 4) all know defects rectified or appropriately carried forward
- 5) all applicable ADs have been applied / recorded
- 6) all modifications and repairs are approved and correctly applied

Airworthiness Review (continued)

- 7) all service life limited components installed are within the approved life limits
- 8) all maintenance has been correctly released
- 9) the current mass and balance statement reflects the configuration of the aircraft and is valid
- 10) the aircraft complies with the latest revision of its approved type design
- 11) the aircraft hold a noise certificate (if applicable) corresponding to the current aircraft configuration

Airworthiness Review (continued)

The approved airworthiness review staff shall carry out a physical survey of the aircraft.

If the airworthiness review staff are not appropriately qualified to Part-66 they shall be assisted by someone that is.

#### Airworthiness Review (continued)

The physical survey of the aircraft shall ensure that:

- 1) all required markings and placards are properly installed
- 2) the aircraft complies with its approved flight manual
- 3) the aircraft configuration complies with the approved documentation
- 4) no evident defect can be found that has not been appropriately addressed
- 5)no inconsistencies can be found between the aircraft and documented records

## Airworthiness Review (continued)

To allow the physical review to take place during a maintenance check, the airworthiness review can be anticipated by a maximum period of 90 days without loss of continuity.

When satisfied that the airworthiness review has been properly carried out and the aircraft is airworthy, an Airworthiness Review Certificate can be issued.

Privileges of the organization (a)

- 1) Manage the continuing airworthiness of aircraft, except those involved in commercial air transport aircraft, as listed on the approval certificate
- 2) Manage the continuing airworthiness of CAT aircraft as listed on both its approval certificate and on its AOC
- 3) Arrange to carry out any task of continuing airworthiness within the limitation of its approval with another organization that is working under its quality system
- 4)Extend Airworthiness Review Certificates (ARC) issued by the CAA or by another appropriately approved CAMO

Privileges of the organization (b)

An approved CAMO be approved to carry out Airworthiness

Reviews, and;

- Issue an Airworthiness Review Certificate (ARC) and extend it in accordance with Subpart I
- 2)Make a recommendation to the competent authority of the state of registry to issue an ARC

Privileges of the organization (c)

A CAMO with the Airworthiness Review privilege, may also be approved to issue a permit to fly in accordance with Part 21.

- 1) On aircraft for which it is approved to issue the ARC, when it is attesting to conformity with approved flight conditions; and
- Subject to an adequate approved procedures in the CAME

Note, privileges are additive. i.e. A, (A + B), (A + B +

#### **Permit to Fly - Flight Conditions**

Approval of 'Flight conditions' is a requirement under Part 21 and can only be approved by the following:

- 1) EASA When related to design
- An appropriately approved Part 21 DOA When related to design
- 3) The competent authority of the state of registry When not related to design

Note: The CAMO privilege extends only to the issue of the Permit to Fly, it does not include the privilege to approve flight conditions

## Permit to Fly - Flight Conditions

- Approval of 'Flight conditions' is a requirement under Part 21 and can only be approved by the following:
- 1) EASA When related to design
- 2) An appropriately approved Part 21 DOA When related to design
- 3) The competent authority of the state of registry When not related to design
- Note: The CAMO privilege extends only to the issue of the Permit to Fly, it does not include the privilege to approve flight conditions

Part M Subpart G - CAMO Quality System To ensure CAMO continues to meet the requirements of Part M, it shall establish a Quality System and designate a Quality Manager to monitor compliance with and adequacy of procedures required to ensure an airworthy aircraft. Compliance monitoring Accountable shall include a Manager feedback system to the Accountable manager to ensure corrective action as necessary Nominated Quality Assurance post holder

Quality System (continued)

The Quality System shall monitor:

- 1) Continued compliance with Part M
- Maintenance is carried out in accordance with the contract
- 3) All Continuing Airworthiness Management (Subpart G) activities performed in accordance with approved procedures
- 4)The output from the CAW process (product audits) Records shall be kept for at least two years

Quality System (continued)

The Quality System can be combined with another approval.

(e.g. Part-145, Part M Subpart F)

In the case of Commercial Air Transport, the Quality System shall be an integrated part of the operators quality system.

**Quality System** 

Quality System (continued)

In a small M.A. Subpart G organizations not managing A/C used in CAT:

- 1) Quality system can be replaced by regular organizational reviews (subject to CAA approval)
- 2) Except where the organization issues ARCs for A/C above 2730 Kg MTOM other than balloons
- 3)They may not sub-contract CAW tasks to other parties

Changes to the organization

The CAMO shall inform the competent authority of any of the following changes

- 1) Name of organization
- 2) Location of organization
- 3) Additional locations
- 4) Accountable manager
- 5) Management personnel
- 6)Scope of work, facilities, staff, procedures that could effect the approval

#### Record Keeping

In addition to the records for each aircraft under the organizations management control, the CAMO shall record all details of work carried out.

- A copy of each ARC issued, recommended or extended and if applicable each Permit to Fly, including supporting documents
- 2) Retain records for up to 24 months after the A/C is permanently withdrawn from service
- 3) Records protected from damage, theft and alteration
- 4)Computer back-ups stored in a different location from the working data

# Part M Subpart I – Airworthiness Review Certificate

Aircraft Airworthiness Review

To ensure the aircraft remains airworthy, a review of the <u>aircraft and its records</u> must be carried out periodically.





### M.A.901(a) - Aircraft Airworthiness Review

An Airworthiness Review Certificate (ARC) EASA Form 15a or 15b is issued after completion of a satisfactory airworthiness review and is valid for 12 months.

First & second extensions

The 'Controlled Environment'

An aircraft in a controlled environment is an aircraft continuously managed by a <u>unique</u> M.A. Subpart G approved continuing airworthiness management organization in the previous 12 months, and;

Which has been maintained for the previous 12 months by approved maintenance organizations.

Including: Pilot-owner maintenance tasks carried out and released to service by a Part 66 licenced engineer or by the pilot-owner.

- An Airworthiness Review Certificate is valid for 12 months.
- Whether a CAMO can issue the ARC or needs to make a recommendation to the CA will depend on the aircraft weight, operation and controlled environment
- The ARC may be extended twice (12 months each time) for aircraft in a controlled environment. A full airworthiness review is therefore only required every three years.
- Aircraft that are not in a controlled environment the ARC cannot be extend. A full airworthiness review will be required every year.
- ■An ARC can only be issued or extended if the aircraft remains airworthy.

#### **Aircraft Airworthiness Review**

It is acceptable to anticipate the extension of the airworthiness review certificate by a maximum of 30 days without a loss of continuity of the airworthiness review pattern, which means that the new expiration date is set up one year after the previous expiration date.

An ARC cannot be issued nor extended if there is evidence or reason to believe that the aircraft is not airworthy.

### M.A.901(g) – Aircraft Airworthiness Review

For ELA1 aircraft not used for CAT or commercial operations, the ARC may also be issued by the CA following a satisfactory assessment, based on a recommendation made by a Part 66 LAE formally approved by the CA.

As well as an appropriate Part 66 licence, they need to have at least three years experience in continuing airworthiness

## M.A.901(g) – Aircraft Airworthiness Review

For ELA1 aircraft not used for CAT or commercial operations, the ARC may also be issued by the CA following a satisfactory assessment, based on a recommendation made by a Part 66 LAE formally approved by the CA.

As well as an appropriate Part 66 licence, they need to have at least three years experience in continuing airworthiness

### Validity of the ARC

An airworthiness review certificate becomes invalid if:

- 1) suspended or revoked; or
- 2) the airworthiness certificate is suspended or revoked; or
- 3) the aircraft is not on the aircraft register of a Member State; or
- 4)the type certificate under which the airworthiness certificate was issued is suspended or revoked

### Transfer of aircraft registration within the EU

- 1) When transferring an aircraft registration within the EU, the applicant shall:
  - a) inform the former Member State in which Member State it will be registered, then
  - b) apply to the new Member State for the issuance of a new airworthiness certificate
- 2)The former ARC (issued by another member state) shall remain valid until its expiry date

### Importing an aircraft from outside the EU

The applicant shall:

1) Make application to the new state of registry for a C of

A

- 2) Have a satisfactory Airworthiness Review carried out in accordance with M.A.901
- 3) Have all maintenance carried out to comply with the approved Aircraft Maintenance program
- 4) Carry out a Check Flight

- 1) Part M Subpart F is a Maintenance organization approval to carry out maintenance on non-large aircraft and components (aeroplanes below 5700 Kg MTOM and single engine helicopters), not used for the purposes of commercial air transport
- 2)Part M Subpart G is an approval to manage aircraft continuing airworthiness. The privilege can also be extended to include the issue of Airworthiness Review Certificates or making recommendations to the CA for the issue of Airworthiness Review Certificates

- 3) An Airworthiness Review Certificate for all CAT aircraft and aircraft above 2730 Kg MTOM can only be issued by an appropriately approved Subpart G organization, when the aircraft has remained within their controlled environment
- 4)An Airworthiness Review Certificate for all aircraft can only be extended by a (appropriately approved) Subpart G organization, when the aircraft has remained within their controlled environment

- 5) An Airworthiness Review Certificate can be issued by an appropriately approved Subpart G organization for aircraft below 2730 Kg MTOM, that are not used for CAT, without the need for the aircraft being in a controlled environment
- 6)organizations with the Airworthiness Review privilege can also be approved to issue Permits to Fly. This applies to aircraft to which it could issue an ARC

- 7) The CAMO 'Permit to Fly' privilege does <u>not</u> include the privilege to approve the 'Flight Conditions'. These must be approved by EASA, an appropriate Part 21 design organization (DOA), or the Competent Authority of the state of registry
- 8) Any maintenance carried out by a Part 66 licenced engineer, with the exception of Pilot / owner maintenance tasks, takes the aircraft outside the controlled environment

## **Questions?**