

Alternative Means of Compliance



CAMO.A.305(c) and AMC1 CAMO.A.305(c)(e) - Requirements for Safety Managers

AltMoC No. IT-AIR-2021-001 of August 13th 2021

This document is an Alternative Means of Compliance (AltMoC) issued by ENAC in accordance with Reg. (EU) 1321/2014, para. CAMO.B.120(e).

Regulatory reference:

Regulation (EU) 1321/2014, Annex Vc

Rule paragraph(s)

CAMO.A.305(c) and related AMC1 CAMO.A.305(c)(e)

List of Effective Pages:

Page number	Revision number	Revision date
1	Initial issue	August 13, 2021
2	Initial issue	August 13, 2021
3	Initial issue	August 13, 2021

Ente Nazionale per l'Aviazione Civile (ENAC) contacts for this AltMoC

ENAC Department	Direzione Regolazione Navigabilità (RNA)
Contact details (email)	c.tripaldi@enac.gov.it navigabilita@enac.gov.it protocollo@pec.enac.gov.it

Initial issue - Issue date: August 13, 2021

Pag. 1 of 3

1	<i>Full description of the AltMoC, which includes reasoning of the AltMoC</i>
	<p>AMC1 CAMO.A.305(c) specifies requirements for Safety Managers in relation to knowledge, qualification and experience with an emphasis on a relevant engineering degree or an aircraft maintenance technician qualification with additional education that is acceptable to the competent authority in paragraph (e).</p> <p>Many existing Safety Managers approved by the CAA under Regulation (EU) No 965/2012, for an Air Carrier licensed pursuant to Regulation (EC) No. 1008/2008, may not fully meet this requirement.</p> <p>This AltMoC offers conditions to the satisfactory completion of which would ensure an acceptable level of required knowledge to comply with the rule. This AltMoC only applies to existing Safety Managers already approved by the CAA under the Regulation (EU) No 965/2012, for an Air Carrier licensed pursuant to Regulation (EC) No. 1008/2008, who are currently in post.</p>
2	<i>Assessment demonstrating that the IR(s) are met</i>
	<p>A Safety Manager (SM) shall be already approved by the CAA in the AOC Management System according to Regulation (EU) No. 965/2012, for an Air Carrier licensed pursuant to Regulation (EC) No. 1008/2008.</p> <p>CAMOs who have applied for the transition from Chapter G of Annex I (Part-M) to Annex Vc (Part-CAMO) of Regulation (EU) No. 1321/2014 shall introduce a Management System. A SM shall also be appointed.</p> <p>If the CAMO is part of an AOC according to Regulation (EU) No. 965/2012, for an Air Carrier licensed pursuant to Regulation (EC) No. 1008/2008, the Management System shall be an integrated part of the Operator's Management System established in accordance with Regulation (EU) No. 965/2012. This means that AOC and CAMO are covered by the same Management System. It is likely that this SM will work for both the AOC and the CAMO. Being the SM in a managing position, he/she may be assisted in performing all the safety management tasks by additional safety personnel in accordance with GM1 CAMO.A.305 (a) (5), point (a). The terms and conditions for this assistance are described in a CAME procedure.</p> <p>In this case, he/she shall meet Part ORO requirements of Regulation (EU) No. 965/2012 for this position as well as those for the same position requested by Part CAMO of Regulation (EU) No. 1321/2014. The requirements are not identical and differ in the following two points that cannot be met through appropriate training, but it may be compensated by an alternative equivalent qualification path and organizational support.</p> <ul style="list-style-type: none"> • CAMO.A.305 c) for the qualification of nominated persons requires the SM to have sufficient experience in the field of managing the airworthiness of aircraft • AMC1 CAMO.A.305 (c), point (e) on the qualification of nominated persons requires a technical professional qualification. This can either be a university degree or a Part-66 license with additional training <p>Said that, an already nominated SM in an AOC holding an aeronautical license (i.e. ATPL) can be considered suitable to be appointed as SM of CAMO, once he/she has completed theoretical training on the PART CAMO and Part M regulations and 21 days of full time practical experience on CAMO and maintenance activities (days could be not consecutive). This practical experience in the typical CAMO and aircraft maintenance activities can complete the theoretical and working knowledge gained attending recognised regulation courses. Anyway, the relationship between the Safety Manager and the additional safety personnel will be clearly defined in the exposition with a clear outline of the delegated responsibilities. The Safety Manager remains the unique focal point.</p>

If a need to updating the CAME procedure dealing with qualification of Safety Managers in the CAMO of an Air Carrier licensed pursuant to Reg. (EU) No. 1008/2008 and obligations will emerge, changes to this procedure require prior approval by the authority

3 *Regulatory wording of the used AltMoC*

AltMoC1 AMC1 CAMO.A.305 (c)(e), Personnel Requirements

As an existing Safety Manager already approved by the CAA in the AOC Management System according to Regulation (EU) No. 965/2012, for an Air Carrier licensed pursuant to Regulation (EC) No. 1008/2008, and assisted by additional safety personnel in accordance with GM1 CAMO.A.305(a)(5), in order to meet the requirement of Part CAMO, the person should demonstrate he/she has successfully completed the following:

- i. A recognised course covering all aspects of Annex I (Part M) of Regulation (EU) No 1321/2014;
- ii. Recorded practical training working with staff within the Operator's CAMO department for a minimum of 14 days, gaining comprehensive knowledge of the following:
 - (1) Development of Aircraft Maintenance Programme (AMP)
 - (2) Aircraft Reliability Programmes
 - (3) Maintenance Steering Group methodology and Maintenance Review Board process,
 - (4) Continuing airworthiness tasks and general principles
 - (5) Continued airworthiness concepts and principles
 - (6) Maintenance planning activities (maintenance planning tasks and control, work-order issuing, Release to Service and Work Report recording, maintenance records control)
 - (7) How the CAMO deals with entries in the technical log of the aircraft (TLB)
 - (8) If necessary, relationship between the CAMO and the subcontractor
 - (9) Airworthiness review, if applicable
 - (10) Further tasks for continuing airworthiness according to Part-M, Subsection C
 - (11) Further tasks of the CAMO according to CAMO.A.315
 - (12) Organisation's CAME
 - (13) Applicable regulations;
- iii. Recorded practical training working with staff within the Operator's AMO department or the maintenance organization contracted by the CAMO for a minimum of at least 7 days, preferably during the maintenance of an aircraft which is managed by the CAMO, gaining comprehensive knowledge of the following:
 - (1) Maintenance standards and methods;
- iv. A relevant aviation qualification that demonstrates the applicant's adequate understanding/knowledge of engineering principles, e.g. ATPL for one of the supervised models.

The relationship between the Safety Manager and the additional safety personnel shall be clearly defined in the exposition with a clear outline of the delegated responsibilities. The Safety Manager remains the unique focal point.

Any change to the personnel structure applied under this alternative means of compliance shall be notified to the authority in line with CAMO.A.130(a)(2).