



SAFETY DECISION 2020-06

Issue 01

Date of Issue: June 23, 2020

SUBJECT:

FLEXIBILITY PROVISIONS DUE TO NOVEL CORONAVIRUS FOR AMO

REFERENCE PUBLICATIONS:

SAFETY DECISIONS 2020-03 & 04: FLEXIBILITY PROVISIONS DUE TO NOVEL CORONAVIRUS.

APPLICABILITY:

This Safety Decision shall only be applicable to below mentioned AMOs.

INTRODUCTION:

The socio-economic impact of the novel coronavirus is yet to be assessed. It has already resulted in drastic restrictions and arrangements preventing Maintenance Organisations from timely completing the necessary training, endorsing or revalidating licences, authorisations etc. and hence ensuring that their ratings and other privileges are revalidated prior to expiry.

As a result of the aforementioned unforeseen circumstances, the CAMA:

- a) found it necessary to reduce the severity of the disruptions; and
- b) would like to present today an immediate response to mitigate the socio-economic impact of the COVID-19 outbreak while assuring an acceptable level of safety.

This Safety Decision is issued to adopt additional provisions to:

- a) provide extensions and flexibility to Certifying and Support Staff Individual Authorisation issued by YCAR-145 Organisation (Requirement No.1);
- b) provide flexibility for assuring competence and continuation training of Certifying Staff or Support Staff or Component Certifying Staff (Requirement no. 2, Requirement no. 4, Requirement no. 4,);
- c) ensure any activities conducted under the umbrella of this SAFETY DECISION is kept on record;
- d) flexibility for quality assurance system (Requirement no. 7);
- e) provisions for addressing current changes to organisations (Requirement no. 8); and

DISCLAIMER:

- a) **If any other flexibility provision is sought, organisations/individuals shall communicate with CAMA for future consideration.**
- b) **This SAFETY DISCISION has been approved by Chairman of the CAMA – hence it does not bear any stamp or signature. To verify its authenticity, anyone can check on CAMA website: <http://www.cama.gov.ye/en/index.php/civil-aviation-legislation/safety-decisions>**
- c) **Once activities return to normal, the CAMA will process any expired certificate, licence, rating, etc. extended using this SAFETY DECISION provided that the extension was issued in accordance with the SAFETY DECISION.**

Flexibility provisions related to Aircraft Maintenance licences and authorisations issued by the CAMA are contained in Safety Decision 2020-03.

Flexibility provisions related to Approved Maintenance Organisation Approvals are contained in Safety Decision 2020-04.

.REQUIREMENTS:

REQUIREMENT No. 1:

AMO may extend, for a maximum period of 6 months, the validity of Individual Certifying Staff or Support Staff or Component Certifying Staff (C/S, S/S or CC/S) Authorization (YCAR-145.35(g)) expiring on or before 31st August 2020 subject to the following conditions:

- a) The organisation has established and implemented a documented and (internally) approved process for the issuance and monitoring of extended Individual Authorisation. Issuance and monitoring of those extensions shall be placed under the responsibility of the Quality Assurance System;
- b) The extension of Individual Authorisation is limited to existing scope of work. No extension of scope of work or removal of limitation shall be allowed;
- c) The organisation provides the holder of an Individual authorization with an extension letter. Any new limitation arising from the risk assessment required below shall be stated, understood and acknowledged by the holder; and
- d) Prior to each extension of the validity of Individual Certifying Staff or Support Staff or Component Certifying Staff (C/S, S/S or CC/S) Authorization, the organisation:
 - i) ensures compliance with Requirement No. 3;
 - ii) ensures that the current authorisation is valid, not cancelled, not suspended or not revoked;
 - iii) ensures compliance with Requirement No. 2.; and
 - iv) ensures that the holder of the authorization has no records of any adverse residual finding/observation/concern related to his/her competency.

REQUIREMENT No. 2:

- a) Competence assessment of C/S, CC/S, S/S and qualified mechanics due on or before 31st August 2020 can be extended by 06 months from March 2020 provided the AMO conducts a Risk Assessment to identify and mitigate hazards created by the inability to comply with YCAR-145.35(g) and to ensure that the holder's competency (including knowledge of applicable regulation and organisation's procedures) and experience (including recent experience as per 145.35(c)) do not compromise safety.
- b) The organisation may decide to implement mitigation measures such as distance learning, self-reading, competency assessment, online questionnaires, video conference or other means to perform the competence assessment without extension etc. to verify competency.

REQUIREMENT No. 3:

- a) Continuation training of C/S, CC/S and S/S and qualified mechanics due on or before 31st August 2020 can be extended by 06 months from March 2020, with the condition for C/S, CC/S and S/S provided that The C/S, CC/S and S/S and qualified mechanics:
 - i) is unable to renew his/her authorization due to COVID-19 pandemic restrictions (mainly Continuation/Human Factor/Fuel Tank Safety/EWIS trainings not completed)
 - ii) receives sufficient continuation training in the preceding 2-year period.
- b) Where, such continuation training was not sufficient according to the defined MOE procedures or not done, the AMO can identify the involved staff in the concession and replace any continuation training standard defined in the MOE with a newly defined continuation training package composed by any (or combination) of the following means:

- i) online virtual training;
- ii) CBT /self-study; and
- iii) read and sign documents issued by the organisation.

REQUIREMENT No. 4:

Continuation training and competence assessment of maintenance staff (except C/S, CC/S, S/S and qualified mechanics) which is due on or before 31st August 2020 can be extended by 06 months from March 2020 provided that alternative measures are in place such as:

- a) The AMO may consider replacing the classroom training by “online virtual training” or “CBT / self-study” to perform the continuation training without extension.
- b) The AMO may use online questionnaires, video conference or other means to perform the competence assessment without extension.

REQUIREMENTS No. 5:

The organisation shall keep record of any extension issued under any provision of this SAFETY DECISION as per current approved record keeping system.

REQUIREMENTS No. 6:

- a) Internal audit plan for 2020: Local AMOs may revise their internal audit plan for 2020 to postpone those audits planned between March 2020 and July 2020 to 31st October 2020 provided changes are coordinated CAMA. On a case by case basis the AMOs may use the option to use desktop audits instead of on-site audits or to postpone some audits to the next year.

Note: Foreign AMOs shall comply with their national aviation authority’s requirements.

- b) Audits to subcontractors/contractors/suppliers for 2020: AMOs shall determine (after risk assessment) the most appropriate means to conduct any audit planned between March 2020 and July 2020 to 31st October 2020. The AMO may either:
 - i) postpone; or
 - ii) replace such audit by an alternative audit (e.g. desktop audit or virtual audit), when the sub-contracted/contracted/supplier maintenance works received by AMO can be fully inspected or oversighted on receipt of the assigned maintenance work by the AMO. If the results of the inspection or oversight activity performed by the AMO are not satisfactory then the AMO must contact CAMA or raise a MOR Report
- c) Internal audit findings: AMOs may extend until 31st December 2020 those findings due dates (raised during the internal audits), which are not impacting safety.
- d) CAMA audit findings: On a case by case basis the AMOs may contact CAMA to agree on the possibility to extend the findings raised by the CAMA. Due to current covid-19 context, a 3-month extension may be allowed to support the industry provided safety is not compromised. However, when the finding has been raised more than 6 months ago, the request for extension shall be submitted to the Principal Inspector and substantiated by a Management of Change (MOC).

REQUIREMENTS No. 7: (Limited to LAMO only)

- a) The notification of the following changes taking place between March 2020 and 31st December 2020 must be reported to CAMA with appropriate Management of Change (MOC):
 - i) Changes in the number of declared staff consisting in a reduction of staff provided there is a reduction in the activity of the AMO proportional to the reduction of staff. (The man-hour plan must show that that the

remaining number of staff is sufficient for the workload of the organisation during the period of reduction)

- ii) Interruption of the activity on some of the workshops or line stations;
 - iii) Complete interruption of the activity of the AMO.
- b) Other changes listed in YCAR 145.85 shall be notified to the assigned principal inspector, this includes, for example, changes to the nominated persons, or if the AMO has to interrupt completely all the activity.

CONTACT:

Any inquiry on this matter, please email to:

- AMO - amo.airworthiness@cama.gov.ye