

**Quick Reference Guide  
(QRG)**

<b>Alleviation Title</b>	Continued validity of maintenance organization approvals
<b>Version</b>	<b>1.0</b>
<b>Publication Date</b>	<b>27 May 2020</b>
<b>Relevant Standard(s)</b>	<p style="text-align: center;"><b>ANNEX 6 Part I CHAPTER 8</b></p> <p style="text-align: center;">8.7 APPROVED MAINTENANCE ORGANIZATION</p> <p>...</p> <p>8.7.1.3 The continued validity of the approval shall depend upon the organization remaining in compliance with the requirements of 8.7 of Annex 6 Part I and with the relevant provisions contained in Annex 19 for an approved maintenance organization.</p> <p>...</p>
<b>CCRD entry required</b>	No
<b>Problem Statement</b>	To meet the intent of the abovementioned Standard, some States have regulations to issue organizations approvals (Aworthiness Maintenance Organizations (AMOs) or organizations performing maintenance under an accepted equivalent system) with or without an expiry date, but with requirements to maintain the continued validity of the approval. One such requirement is to conduct on-site surveillance to confirm that the organizations remain in compliance with their requirements and ICAO Standards. Due to travel restrictions and physical distancing requirements associated with COVID – 19 crisis, CAAs in many States are unable to perform on-site surveillance activities to ensure that organization approvals continue to remain valid.
<b>Applicability/Pre-requisites</b>	<p>This alleviation applies to AMOs or organizations performing maintenance under an accepted equivalent system if:</p> <ul style="list-style-type: none"> <li>• the State has determined that the organization has a satisfactory regulatory compliance history; and</li> <li>• continuation of approval of such organizations relies on the on-site surveillance activities required to be completed during the alleviation period, by the CAAs issuing the approval; and</li> <li>• the CAAs are unable to perform on-site surveillance activities due to COVID-19 crisis.</li> </ul> <p>This alleviation applies for the period established by the State and ending no later than 31 March 2021.</p>
<b>Alleviation summary</b>	This alleviation allows for the continuation of the validity of AMOs or organizations performing maintenance under an accepted equivalent

	<p>system approval, where the continuation of the validity relies on the on-site surveillance activities required by the State.</p>
<p><b>Operational context</b></p>	<ul style="list-style-type: none"> <li>• Maintenance organizations holding a valid approval and all the requirements for the continuation of the approval of the organization(s) have been met, except for the CAAs on-site surveillance.</li> <li>• Management of the change to re-establish normal surveillance activities in an orderly way post COVID-19 contingencies need to be considered.</li> <li>• The alleviations timeframe is limited to a period needed to continue operation and should be revoked once compliance with the standard can be achieved through normal surveillance activities.</li> <li>• Using a risk-based approach, including the risk profile of organizations to determine which organizations are of greater risk or concerns and prioritize the resources and surveillance required for such organizations should be considered. In determining the risk profile of an organization, States may consider the following: <ul style="list-style-type: none"> <li>➤ the organizations current levels of risk given the changing landscape of aviation operations.</li> <li>➤ changes in activity and/or capability during the COVID-19 crisis period.</li> <li>➤ the robustness of the organizations quality system.</li> </ul> </li> </ul>
<p><b>Possible Mitigations and/or solutions</b></p>	<p>In order to maintain an equivalent level of safety and to ensure that appropriate oversight is maintained in light of the rapidly changing conditions imposed by COVID-19, the following mitigations may be considered:</p> <p><b><i>For maintenance organizations approved and located within State of Registry (SoR).</i></b></p> <ul style="list-style-type: none"> <li>• The alternatives adopted to performing on-site surveillance activities should ensure continued compliance with appropriate requirements by the maintenance organization. This could comprise: <ul style="list-style-type: none"> <li>➤ Desktop audits to assess the effectiveness of the procedures contained in the approved Maintenance Organization Procedures Manual (MOPM) and to ensure the availability of adequate systems for the planning, controlling and performance of maintenance.</li> <li>➤ Other systems/tools to remotely review documentation (e.g. maintenance and personnel training records, maintenance certifications, etc.) and address issues, which require interaction between the organization and the CAA.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>➤ Other interactive means such as remote interviews and inspections to assess the adequacy of the facilities, equipment, tools and materials, etc.</li> </ul> <p><b><i>For maintenance organizations approved by the SoR and located in a State other than the SoR.</i></b></p> <ul style="list-style-type: none"> <li>• When the States approve an organization that is located in other States, its ability to make on-site visits may be significantly lower than that of the State in which the organization is based. The approving State should consider as a mitigating measure, arrangements between States to reduce duplication of surveillance by: <ul style="list-style-type: none"> <li>➤ Giving credit and/or recognize the surveillance activity performed by the State where the organization is based, which benefits from proximity and easier access to the organization; or</li> <li>➤ delegating the on-site surveillance activity to the State the organization is based in;</li> </ul> </li> <li>• If none of the above is practicable, the mitigations listed above for the maintenance organizations approved and located within the SoR could be applied.</li> </ul>
<b>Alleviations likely to be unacceptable to other States</b>	An alleviation applicable to AMOs or organizations performing maintenance under an accepted equivalent system approval if such an organization is subject to enforcement of any suspension, cancellation or revocation action.
<b>References:</b>	<ul style="list-style-type: none"> <li>• Airworthiness Manual (Doc 9760)</li> <li>• Annex 19 (Safety Management)</li> <li>• ICAO Handbook for CAAs on the Management of Aviation Safety Risks related to COVID-19 (Doc 10144)</li> <li>• Safety management manual (9859)</li> <li>• Safety Oversight Manual (Doc 9734) Part A</li> </ul>
<i>This guidance has been developed by ICAO with the support of SME's made available from States and Industry through different ANC panels, study groups and other expert groups.</i>	