

**Quick Reference Guide  
(QRG)**

<b>Alleviation Title</b>	<b>Operators' continuing airworthiness responsibilities</b>
<b>Version</b>	<b>1.0</b>
<b>Publication Date</b>	<b>23 June 2020</b>
<b>Relevant Standard(s)</b>	<p style="text-align: center;"><b>ANNEX 6 Part I CHAPTER 8 AEROPLANE MAINTENANCE</b></p> <p>8.1 OPERATOR'S MAINTENANCE RESPONSIBILITIES<sup>++</sup>  8.1.1 Operators shall ensure that, in accordance with procedures acceptable to the State of Registry:</p> <p>a) each aeroplane they operate is maintained in an airworthy condition;  ...  8.1.4 The operator shall employ a person or group of persons to ensure that all maintenance is carried out in accordance with the maintenance control manual.</p> <p>...</p> <p style="text-align: center;"><b>ANNEX 6 PART III SECTION II CHAPTER 6. HELICOPTER MAINTENANCE<sup>++</sup></b></p> <p>6.1.1 Operators shall ensure that, in accordance with procedures acceptable to the State of Registry:</p> <p>a) each helicopter they operate is maintained in an airworthy condition;  ...  6.1.4 The operator shall employ a person or group of persons to ensure that all maintenance is carried out in accordance with the maintenance control manual.</p>
<b>CCRD entry required</b>	No
<b>Problem Statement</b>	To meet the intent of the abovementioned Standard, some States issue acceptances or approvals to a person or group of persons within the operator or a maintenance control organization with a specific approval (e.g. EASA Part M, Subpart G) to manage the continuing airworthiness responsibilities of the operator, both with requirements to maintain the continued validity of the acceptance/approval. One such State requirement is to conduct an on-site inspection to confirm that the operator and the maintenance control organizations with continuing

	<p>airworthiness responsibilities remain in compliance with State requirements and ICAO Standards.</p> <p>Due to travel restrictions, physical distancing requirements associated with COVID–19 crisis, CAAs in many States have difficulty to perform on-site inspection activities to ensure that operators and maintenance control organizations remain in compliance with State requirements regarding their respective responsibilities.</p>
<p><b>Applicability/Pre-requisites</b></p>	<p>This alleviation applies to an operator or to a maintenance control organization with continuing airworthiness responsibilities if the State has determined that the operator or the maintenance control organization has a satisfactory regulatory compliance history and the on-site inspection activities required to be completed during the alleviation period could not be performed by the CAAs issuing the acceptance/approval for the:</p> <ul style="list-style-type: none"> <li>➤ continuation of acceptance of a person or group of persons within an operator with continuing airworthiness responsibilities; or</li> <li>➤ continuation of the specific approval for a maintenance control organization with continuing airworthiness responsibilities (e.g. EASA Part M, Subpart G, Part-CAMO) for an operator;</li> </ul> <p>This alleviation applies for the period established by the State and ending no later than 31 March 2021.</p>
<p><b>Alleviation summary</b></p>	<p>This alleviation allows for the continuation of the acceptance/approval of person or group of persons within an operator or a maintenance control organization with continuing airworthiness responsibilities, where the continuation of the acceptance/approval relies on the on-site inspection activities required by the State.</p>
<p><b>Operational context</b></p>	<p>The person or group of persons within an operator or a maintenance control organization with continuing airworthiness responsibilities holding a valid acceptance/approval during this alleviation period have met the requirements for the continuation of the acceptance/approval, except for the CAA’s on-site inspection.</p> <p>Management of the change to re-establish normal on-site inspection activities in an orderly way post-COVID-19 contingencies need to be considered.</p> <p>The use of a risk-based approach, including the risk profile of the operators and the maintenance control organization, to determine which organizations are of greater risk or concerns and prioritize the resources and on-site inspection required for such organizations should be</p>

	<p>considered. In determining the risk profile, States may consider the following:</p> <ul style="list-style-type: none"> <li>➤ the organization’s current level of risk given the changing landscape of aviation operations.</li> <li>➤ changes in activity and/or capability during the COVID-19 contingency.</li> <li>➤ the robustness of the organization’s quality system.</li> </ul> <p>Alternatives to performing on-site inspection activities during the COVID-19 crisis should be considered by the CAA to ensure that the on-site inspection obligations are met.</p>
<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 should be considered:</p> <p><b><i>For person or group of persons within the operator or maintenance control organization with continuing airworthiness responsibilities located <u>within</u> the State issuing the acceptance/approval.</i></b></p> <ul style="list-style-type: none"> <li>• The alternatives adopted to performing on-site inspection activities should ensure continued compliance with appropriate requirements by the operator or maintenance control organization with continuing airworthiness responsibilities. This could comprise: <ul style="list-style-type: none"> <li>○ Desktop audits-to assess the effectiveness of the procedures contained in the accepted Maintenance Control Manual (MCM) and to ensure the availability of adequate systems for the planning of maintenance.</li> <li>○ Other systems/tools to remotely review documentation (e.g. maintenance programmes, records and certifications, etc.) and address issues, which require interaction between the operator or maintenance control organization with continuing airworthiness responsibilities and the CAA.</li> </ul> </li> <li>• Other interactive means such as remote interviews and inspections to assess the adequacy of the: <ul style="list-style-type: none"> <li>○ facilities and equipment etc.; and</li> <li>○ structure of the applicant's maintenance control organization.</li> </ul> </li> </ul> <p><b><i>For person or group of persons within the maintenance control organization with continuing airworthiness responsibilities located <u>outside</u> the State issuing the approval.</i></b></p>

	<p>When a State has on-site inspection responsibilities, it must conduct in another State, its ability to make on-site visits may be significantly lower than that of the State in which the maintenance control organization with continuing airworthiness responsibilities is based. The approving State should consider as a mitigating measure, arrangement between States to reduce duplication of on-site inspection by:</p> <ul style="list-style-type: none"> <li>○ Giving credit and/or recognize the on-site inspection activity performed by the State where the maintenance control organization is based, which benefits from proximity and easier access to the maintenance control organization; or</li> <li>○ delegating the on-site inspection activity to the State the maintenance control organization is based in</li> </ul> <p>In the event that none of the above is practicable, the mitigations listed above for the “person or group of persons within the operator or maintenance control organization with continuing airworthiness responsibilities located <b><i>within</i></b> the State issuing the acceptance/approval” apply.</p> <p>Note: It is important that CAA coordinate within the appropriate departments to ensure that any interfaces are managed if required.</p>
<p><b>Alleviations likely to be unacceptable to other States</b></p>	<p>An alleviation applicable to a person or group of persons within the operator or maintenance control organization with continuing airworthiness responsibilities subject to relevant enforcement, or any suspension or cancellation action.</p>
<p><b>References:</b></p>	<ul style="list-style-type: none"> <li>● Airworthiness Manual (Doc 9760)</li> <li>● ICAO Handbook for CAAs on the Management of Aviation Safety Risks related to COVID-19 (Doc 10144)</li> <li>● Manual of Procedures for Operations Inspection, Certification and Continued Surveillance (Doc 8335)</li> <li>● Safety management manual (9859)</li> </ul>
<p><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></p>	