



WORKING PAPER

ASSEMBLY — 42ND SESSION

TECHNICAL COMMISSION

Agenda Item 24 : Aviation Safety and Air Navigation Priority Initiatives

MUTUAL RECOGNITION OF APPROVED MAINTENANCE ORGANIZATION CERTIFICATES

(Presented by African Civil Aviation Commission on behalf of 54 African States²)

EXECUTIVE SUMMARY

The certification and oversight of approved maintenance organizations (AMOs) by multiple Civil Aviation Authorities (CAAs) often lead to operational inefficiencies, regulatory duplication and high compliance costs for both AMOs and airlines. The absence of globally harmonized standards and mutual recognition frameworks results in maintenance delays, increased costs, and potential gaps in safety oversight.

ICAO has recognized these challenges and is working on developing standards and guidance material for the mutual recognition of foreign AMO certificates. While this effort is commendable, there is an urgent need to expedite the process to ensure global regulatory consistency and efficiency.

Action: The Assembly is invited to:

- a) urge States and Regional Safety Oversight Organizations (RSOOs) to maintain commitment and to assist each other in the establishment of mechanisms to recognize the approval of maintenance organization;
- b) direct ICAO to finalize standardization and harmonization of mutual recognition of AMO certificates through an appropriate framework for implementing mutual recognition agreements (MRAs); and
- c) direct ICAO to develop mechanisms to enhance regulatory capacity and surveillance of AMOs.

<i>Strategic Goals:</i>	This working paper relates to the Strategic Goal <i>Every Flight is Safe and Secure</i> .
<i>Financial implications:</i>	Not applicable.
<i>References:</i>	Annex 6 — <i>Operation of Aircraft</i> Annex 8 — <i>Airworthiness of Aircraft</i> Doc 9760, <i>Airworthiness Manual</i> Doc 10184, <i>Assembly Resolutions in Force (as of 7 October 2022)</i> Assembly Resolutions A38-12, A29-3, A38-12, A41-10. Doc 7300, <i>Convention on International Civil Aviation</i>

¹ English and French versions provided by AFCAC.

² Algeria, Angola, Benin, Botswana, Burkina Faso, Burundi, Cameroon, Cabo Verde, Central African Republic, Chad, Comoros, Congo, Côte d'Ivoire, Democratic Republic of the Congo, Djibouti, Egypt, Equatorial Guinea, Eritrea, Eswatini, Ethiopia, Gabon, Gambia, Ghana, Guinea, Guinea-Bissau, Kenya, Lesotho, Liberia, Libya, Madagascar, Malawi, Mali, Mauritania, Mauritius, Morocco, Mozambique, Namibia, Niger, Nigeria, Rwanda, São Tomé and Príncipe, Senegal, Seychelles, Sierra Leone, Somalia, South Africa, South Sudan, Sudan, Togo, Tunisia, Uganda, United Republic of Tanzania, Zambia, Zimbabwe.

1. INTRODUCTION

1.1 ICAO, through Annex 8 — *Airworthiness of Aircraft* and Annex 6 — *Operation of Aircraft*, sets international standards for aircraft maintenance, including approved maintenance organization (AMO) oversight. However, the absence of mutual recognition frameworks among Civil Aviation Authorities (CAAs) has led to inconsistent certification processes, duplicated audits and surveillance activities, and additional compliance costs.

1.2 The Chicago *Convention on International Civil Aviation* (Doc 7300) and ICAO Assembly Resolution, such as A29-3: Global Rule Harmonization, have emphasized the importance of global harmonization in regulatory oversight. Despite ICAO's efforts under the Universal Safety Oversight Audit Programme Continuous Monitoring Approaches (USOAP CMA), the lack of a global standardized and harmonized approach for AMO certification remains a challenge.

2. DISCUSSION

2.1 Operational and regulatory challenges

2.1.1 The lack of mutual recognition increases compliance costs for AMOs, which must adhere to varying and sometimes conflicting national requirements. This additional financial burden affects the competitiveness of the maintenance sector, especially in developing aviation markets.

2.2 Safety and oversight considerations

2.2.1 ICAO's USOAP audits have revealed disparities in how States implement AMO oversight. A harmonized approach with mutual recognition agreements (MRAs) would improve global consistency and adherence to ICAO standards.

2.2.2 The aviation industry, including organizations such as the International Air Transport Association (IATA) and the maintenance, repair, and overhaul (MRO) sector, has advocated for harmonized AMO certification to optimize operational efficiency without compromising safety.

2.2.3 ICAO's ongoing work to develop standards and guidance material on the mutual recognition of AMO certificates is a step in the right direction. However, the pace of implementation should be accelerated to address the urgent need for standardized, harmonized and efficient maintenance organization oversight.

3. PROPOSED ACTIONS

3.1 Establishment of a mutual recognition framework

3.1.1 In addition to ICAO Doc 9760, *Airworthiness Manual*, Part III — State of Registry, Chapter 10, paragraphs 10.2.2, 10.2.3, 10.4.2 and 10.4.3, ICAO should develop a global framework to guide the implementation of the mutual recognition of an AMO. This framework should reinforce the MRAs among States. Such agreements would ensure that AMO approvals granted by one State are recognized by others, reducing redundant oversight. Lessons can be drawn from existing bilateral agreements, such as those between the European Union Aviation Safety Agency (EASA) and the Federal Aviation Administration (FAA), to establish a global model for AMO recognition.

3.1.2 Regional Safety Oversight Organizations (RSOOs), especially those with an enforceable regulatory framework, can serve as an implementation platform for the:

- a) facilitation of the standardization and harmonization of maintenance organization approval;
- b) establishment of a MRA amongst its Member States;
- c) realization of a single audit/inspection of other ICAO Member States for its members' States; and
- d) Issuing a single recognition certificate of AMO approvals granted by other ICAO member States for its Member States.

3.1.3 RSOOs with the support of ICAO and appropriate regional bodies can then mutualize efforts through a satisfactory regulatory framework to be agreed upon to come up with a single MRA for each region/community or group of States leading to a single audit/inspection with the issuance of a single recognition certificate, of AMO approvals granted by other ICAO Member States.

3.1.4 Chicago Convention, Article 33 — Recognition of certificates and licenses provision requires recognition by the other Contracting States of the certificates of airworthiness and certificates of competency and licenses issued or rendered valid by the Contracting State in which the aircraft is registered, provided that the requirements under which such certificates or licenses were issued or rendered valid are equal to or above the minimum standards which may be established from time to time pursuant to the Convention. In addition, Annex 6 — *Operation of Aircraft*, Part I — *International Commercial Air Transport — Aeroplanes*, paragraph 4.2.2.1 stipulates that Contracting States shall recognize as valid an air operator certificate issued by another Contracting State, provided that the requirements under which the certificate was issued are at least equal to the applicable Standards specified in this Annex and in Annex 19. By similarity with the provisions above, ICAO can create standard for the mutual recognition of AMO by Contracting States other than States of Registry, provided that the requirements under which the approval was issued are at least equal to the applicable Standards.

3.2 Strengthening regulatory capacity and oversight mechanisms

3.2.1 ICAO is encouraged to brainstorm further and should accentuate technical assistance to support States in enhancing their oversight capabilities. This includes adequate training programs and competencies for inspectors and the development of risk-based oversight methodologies.

3.2.2 The adoption of digital certification and oversight tools, such as electronic record-keeping and blockchain-based certification, should be explored to improve efficiency and transparency.

3.3 Implementation tools

3.3.1 The establishment by ICAO of global database designed to collect and share data and information on AMO should support States and RSOO in the implementation of AMO mutual recognition Framework.

3.3.2 This tool will provide a one-stop access to safety data and information related to all States approved maintenance organization allowing the ability to enter, validate and modify in control manner the data regarding AMO scope and approval validity, as required.

4. CONCLUSIONS

4.1 The lack of standardized and harmonized AMO certification and mutual recognition frameworks continues to hinder efficiency in aircraft maintenance operations. The resulting regulatory burden affects AMOs, airlines, and CAAs while offering no significant safety benefits.

4.2 ICAO has already initiated efforts to develop guidance material on mutual recognition of AMO certificates. However, the pace of development and implementation must be expedited to optimize state safety oversight resources and to meet industry needs for more uniformity and efficiency.

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