

# CAA Nepal- COVID19 Quick Reference Guide

## APPENDIX 12- CONTINUED VALIDITY OF MAINTENANCE ORGANIZATION APPROVALS

<b>Alleviation Title</b>	Continued Validity of Maintenance Organization Approvals
<b>Version</b>	<b>1.0</b>
<b>Publication Date</b>	<b>29 May 2020</b>
<b>Relevant Standard(s)</b>	<p>(a) An approval shall be issued or renewed for a maximum period of two year. It shall remain valid subject to: NCAR Part 145 (NCAR 145.A.90) states:</p> <ol style="list-style-type: none"><li>1. the organisation remaining in compliance with NCAR Part-145, in accordance with the provisions related to the handling of findings as specified under NCAR 145.B.50; and</li><li>2. CAA Nepal being granted access to the organisation to determine continued compliance with NCAR Part-145; and</li><li>3. the certificate not being surrendered or revoked.</li></ol> <p>(b) Upon surrender or revocation, the approval shall be returned to CAA Nepal.</p>
<b>Problem Statement</b>	<p>To meet the intent of the above mentioned Standard, some States have regulations to issue organizations approvals (Approved 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. Nepal has regulation of issuance of maintenance organization approval with expiry date with continuous surveillance for the compliance with applicable requirements.</p>

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<b>Applicability/ Minimum pre-requisite</b>	<p>This alleviation applies to AMOs if:</p> <ul style="list-style-type: none"> <li>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 till 31 July 2020.</p>
<b>Alleviation summary</b>	This alleviation allows for the continuation of the validity of AMOs
<b>Operational context</b>	<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 CAAN on-site surveillance.</li> <li>Management of the change to re-establish normal surveillance activities in an orderly way post COVID-19 contingency 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, CAAN will 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>
<b>Possible Mitigations and Solutions</b>	<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 Nepal.</i></b></p> <p>When onsite surveillance on AMOs located in Nepal is not feasible during the COVID-19 pandemic period, alternatives adopted to performing on-site surveillance activities will ensure continued compliance with NCAR145 requirements by the respective maintenance organization. These alternative means may comprise one or combination of following means.</p>

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	<ul style="list-style-type: none"> <li>➤ Desktop audits to assess the effectiveness of the procedures contained in the approved Maintenance Organization Exposition (MOE) 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 Nepal.</li> <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 CAAN and located in a State other than Nepal.</i></b></p> <p>CAAN is fully aware that when AMO when is located in other States, possibility to make on-site visits may be significantly lower than that of the AMOs based in Nepal. CAAN is also aware of the fact that a consideration on the mitigating measure, arrangements between CAAN and local authority (where the AMO is physically located) to reduce duplication of surveillance may be arranged by:</p> <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 with necessary administrative arrangement or memorandum of understanding (MOU), as applicable.</li> </ul> <p>If none of the above is practicable, the mitigations listed above for the maintenance organizations approved and located within the Nepal may be considered.</p>
<b>Alleviations likely to be unacceptable to other States</b>	An alleviation applicable to AMOs is subject to enforcement of any suspension, cancellation or revocation action
<b>References</b>	<ul style="list-style-type: none"> <li>➤ NCAR 145</li> <li>➤ CAAN CAR 19 on Safety Management</li> </ul>