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SASOC 2026

CAMO/Part-145

Ronald Meier, Andreas Boss

8. Mai 2026 | Bern, Zentrum Paul Klee

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SASOC 2026

CAMO/Part-145

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Content

Regulatory guidelines

CAMO / Part-145 updates

Management of Changes

Regulatory guidelines

Andreas Boss

Regulatory guidelines

Overview (what changed)

Introduction of Safety Management System (SMS) requirements

Introduction of Information Security Management System (ISMS)

Shift from compliance-based oversight → risk & performance-based oversight

Regulatory guidelines

SMS Expectations

Hazard identification & risk management embedded in daily operations

Occurrence reporting & safety data analysis

Safety performance monitoring (SPIs)

Management of Change (MoC)

Safety culture & just culture

Regulatory guidelines

ISMS Expectations

Identification of information assets (hardware and software)

Risk assessment of cyber threats and vulnerabilities

Protection of airworthiness and safety-critical data

Incident detection, response, and recovery

Integration with SMS (cyber risk = safety risk)

C.I.A concept (Confidentiality-Integrity-Availability)

Regulatory guidelines

SMS / ISMS Integration

Safety risks and information security risks are overlapping

Cyber incidents can directly affect airworthiness and safety

Management of change must consider both safety + information security impacts

Examples:

New IT system → safety + cybersecurity assessment

Subcontractor → competence + data protection risks

Regulatory guidelines

Management of Change (MoC) Expectations

Management of Change shall

Include safety + human factors + information security risks

Be documented and traceable

Be applied to:

- Organisational changes
- IT/system changes
- Regulatory changes
- Personnel changes

Regulatory guidelines

Oversight Principles according Section B of implementing rules

FOCA verification responsibilities:

- Ensure compliance before certification
- Ensure continued compliance of approved organisations
- Verify implementation of mandated safety measures

Regulatory guidelines

Oversight Principles according Section B of implementing rules

FOCA oversight activities must

- Be supported by documented procedures/guidance for inspectors
- Provide feedback/results to organisations
- Be based on:
  - Assessments
  - Audits & inspections
  - Unannounced inspections

Regulatory guidelines

Audit	refers to a systematic, independent, and documented process for obtaining evidence, and evaluating it objectively to determine the extent to which requirements are complied with. Note: Audits may include inspections.
Assessment	in the context of management system performance monitoring, continuous improvement and oversight, refers to a planned and documented activity performed by competent personnel to evaluate and analyse the achieved level of performance and maturity in relation to the organisation's policy and objectives. Note: An assessment focuses on desirable outcomes and the overall performance, looking at the organisation as a whole. The main objective of the assessment is to identify the strengths and weaknesses to drive continual improvement. Remark: For 'risk assessment', please refer to the definition below.
Inspection	in the context of compliance monitoring and oversight, refers to an independent documented conformity evaluation by observation and judgement accompanied, as appropriate, by measurement, testing or gauging, in order to verify compliance with applicable requirements. Note: Inspection may be part of an audit (e.g. product audit), but may also be conducted outside the normal audit plan; for example, to verify closure of a particular finding.

Regulatory guidelines

Risk & Performance-Based Oversight (RPBO)

FOCA risk-based oversight approach is determined by:

- Organisation complexity and activities
- Past oversight results
- Identified safety priorities
- Reporting culture and occurence

Regulatory guidelines

Risk & Performance-Based Oversight (RPBO)

- planning is driven by the combination of risk profile and safety performance; and
- execution focuses on the management of risk, in addition to ensuring compliance

Regulatory guidelines

Risk & Performance-Based Oversight (RPBO)

WHAT IS THE RISK PROFILE?

Regulatory guidelines

Risk & Performance-Based Oversight (RPBO)

Risk Profile

The elements of risk that are inherent to the nature and the operations of the regulated entity, this includes:

- the specific nature of the organization/operator
- the complexity of its activities
- the risks stemming from the activities carried out

Regulatory guidelines

Risk & Performance-Based Oversight (RPBO)

WHAT IS SAFETY PERFORMANCE?

Regulatory guidelines

Risk & Performance-Based Oversight (RPBO)

Safety Performance

The demonstration of how effectively can a regulated entity mitigate its risks, substantiated through the proven ability to:

- comply with the applicable requirements;
- implement and maintain effective safety management;
- identify and manage safety risks;
- achieve and maintain safe operations;
- the results of past certification and/or oversight also need to be taken into account

Regulatory guidelines

Risk & Performance-Based Oversight (RPBO)

Safety Performance

Occurrence Management - Reporting Culture - Safety Culture

Regulatory guidelines

Risk & Performance-Based Oversight (RPBO)

Safety Performance

Occurrence Management

Challanges	Why it matters
Clear definition of an “occurrence”	Aligns expectations and ensures consistent reporting
Formal reporting workflow	Guarantees that every event is captured, assessed and acted upon
Timelines & responsibilities	Prevents delays that could compromise safety
Root-cause analysis (RCA) methods	Drives effective corrective actions
Corrective-action tracking	Demonstrates closure and effectiveness
Feedback loop to operators & maintenance	Closes the learning cycle
Regulatory compliance	Meets EASA CAMO obligations
Performance metrics	Enables continuous improvement

Regulatory guidelines

Risk & Performance-Based Oversight (RPBO)

Safety Performance

Reporting Culture

Aspect	Key message
Non-punitive environment	Staff should feel safe to report without fear of disciplinary action
Anonymity options	Lowers barriers for reporting sensitive issues
Ease of reporting	Simplicity drives higher reporting rates
Leadership commitment	Sets the tone from the top
Recognition & feedback	Reinforces positive behaviour
Training & awareness	Embeds the behaviour in daily routine
Data handling & confidentiality	Builds trust that information is used responsibly
Benchmarking & sharing	Shows tangible benefits

Regulatory guidelines

Risk & Performance-Based Oversight (RPBO)

Safety Performance

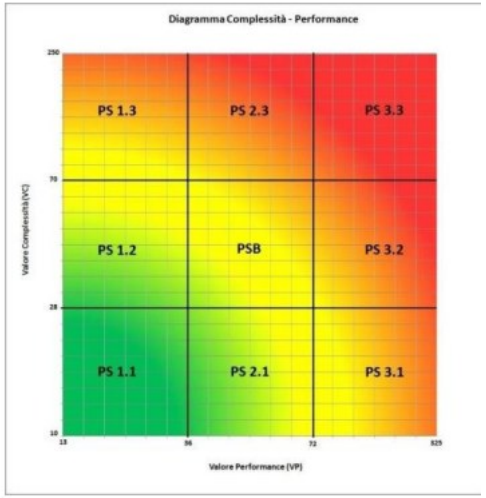
Safety Culture

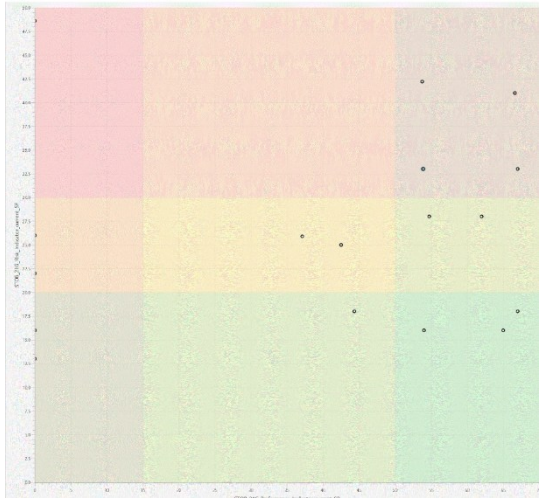
Pillar	What to communicate
Leadership commitment	Safety is part of the mission, not an add-on
Shared responsibility	Everyone—from pilots to admin staff—contributes to safety
Transparency & communication	Open sharing of safety information builds confidence
Continuous learning	Lessons from incidents are turned into improvements
Risk-based thinking	Decisions are based on assessed risk levels
Performance monitoring	Objective data underpins safety decisions
Empowerment	Staff can stop operations if safety is compromised.
Compliance with EASA guidance	Aligns with external expectations

Regulatory guidelines

Risk & Performance-Based Oversight (RPBO)

- planning is driven by the combination of risk profile and safety performance; and
- execution focuses on the management of risk, in addition to ensuring compliance





Regulatory guidelines

Risk & Performance-Based Oversight (RPBO)

Oversight program

12 months

if there is any evidence that the safety performance of the organisation has decreased

24 months (standard)

36 months

no Level 1 Findings

effective hazard identification and safety risk management

full control of changes

timely implementation of corrective actions

48 months

in addition to the conditions for 36 months, the organisation has established, and the FOCA has approved, an effective continuous reporting system to the competent authority on the safety performance and regulatory compliance of the organisation itself.

Regulatory guidelines

CAMO and Part-145 update

Roni Meier

CAMO and Part-145 updates

Upcoming Regulation changes:

- **(EU) 2026/100 including (EU) 2026/056**
  - It updates (EU) 748/2012 and (EU) 1321/2014
  - Clarification in Occurrence reporting
  - Removal of Controlled Environment
  - Part M.A.90x and ML.A.90x completely rewritten
  - Import of Aircraft without CofA for Export

  - Applicable as of 7. August 2026

Occurrence Reporting

- M.A.202 & ML.A.202 Occurrence reporting rewritten and clarified
  Similar text as in Part-145 and Part-CAMO

- Reports required, shall be made to the Competent Authority of the State of Registry and to the TC-Holder

ARC Removal of «Controlled Environment»

- All References to the “Controlled Environment” have been removed
- Content in M.A.90x and ML.A.90x have been rearranged
- Many Articles have been reworded and clarified

➢ Review your Exposition

Airworthiness review – General

(M.A.901 / ML.A.901)

Article completely reworded, removed “Controlled environment”

Any CAMO+/CAO+ shall issue an ARC under following conditions:

- the continuing airworthiness of the A/C has been continuously managed according to M.A.201 / ML.A.201 since the issue of the former ARC;
- the aircraft has been maintained in accordance with (EU) 1321/2014 since the issue of the former ARC;
- the airworthiness certificate (CofA) has been issued in accordance with (EU) 748/2012 and is not revoked or surrendered at the time of the review;

Issue a recommendation for the issuance of an ARC to the competent authority, if the conditions above are not met.

Validity of ARC

(M.A.902 / ML.A.902)

Extension of the ARC is only possible by the organisation managing the continuing airworthiness of the aircraft, subject to the following conditions: :

- the continuing airworthiness of the aircraft has been continuously managed by that organisation since the issue of the ARC;
- the aircraft has been maintained since the issue of the ARC by a maintenance organisation approved in accordance with Part-145 or Part-CAO, as applicable *;
- the organisation managing the continuing airworthiness of the aircraft has no evidence or reason to believe that the aircraft is not airworthy.

* The maintenance referred to above, may include pilotowner maintenance tasks carried out and released to service either by the pilotowner or by independent certifying staff.

Airworthiness review process

(M.A.903 / ML.A.903)

- Completely rewritten with new content from former M.A.901(k–m)
- Former content moved to M.A.905
- M(L).A.903 describes the process of the airworthiness review and what to look for in
  - (b) through the documented review of the aircraft …
  - (c) through the physical survey of the aircraft …
- The ARC and the recommendation shall not be issued until all actions to eliminate the detected non-compliance have been implemented.

Airworthiness review staff

(M.A.904 / ML.A.904)

- New content in this chapter
- Former content has been moved to M(L).A.906
- The qualification of ARC staff is referenced here

Additionally in ML.A.904(c) for ARS acting on their own behalf shall

(1) Hold a license according to Part-66 for the corresponding aircraft

(2) Hold an authorisation issued by the competent authority

Transfer of aircraft within EU

(M.A.905 / ML.A.905)

- New content in chapter transferred from former M(L).A.903
- The former M(L).A.905 has been moved to M(L).A.907
- The transfer of aircraft registration within the union is described here
- A new procedure has been added in case the ARC becomes invalid during the transfer

Import of aircraft into EU

(M.A.906 / ML.A.906)

- New chapter
- Airworthiness review of aircraft without an airworthiness certificate issued in accordance with regulation (EU) No 748/2012
- Describes the process for applying for an airworthiness certificate in accordance with EU 748/2012 based on an alternative mechanism based on investigation and evaluation activities
- The evaluation Programme is introduced to provide an alternative
    - It is limited to exceptional cases only, and
    - This privilege can only be used if the development of the evaluation programme and the conduct of the investigations are both described in the CAME/CAE, and if these descriptions have been approved.

Findings

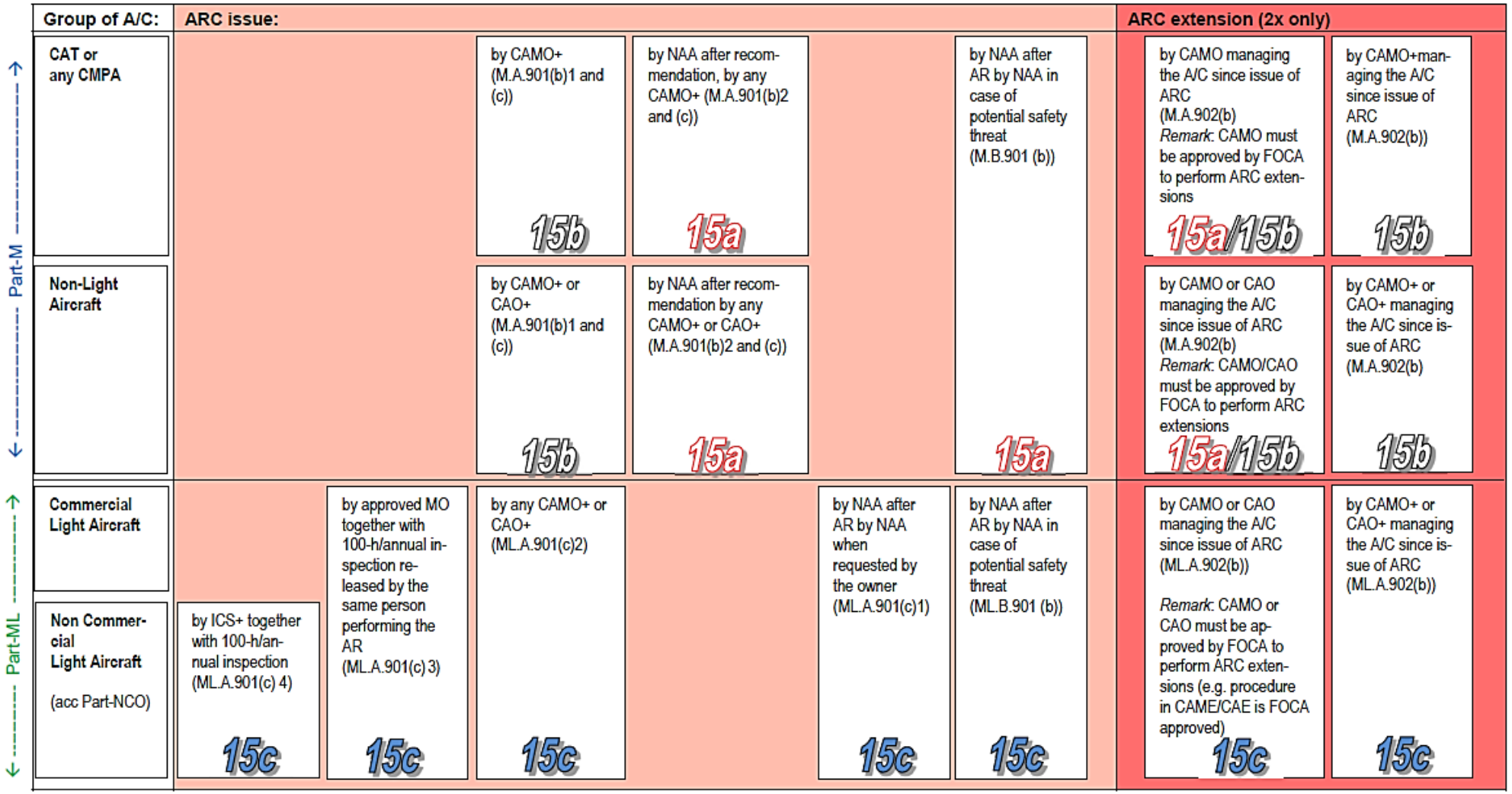
(M.A.907 / ML.A.907)

- New chapter
- Describes how to react to findings from the NAA
- Content in chapter transferred from former M.A.905
- The finding classification has been removed

Oversight of Airworthiness Review

Airworthiness Review

(based on Regulation (EU) No. 1321/2014 up to and including (EU) No. *2026/100*)



Note: Only Applicable for CAMO/CAO with its principal place of business in a Member State (CAMO.A.125(e), CAO.A.095(c)(1))

For abbreviations and definitions used above, see reverse side

Valid as of 07.08.2026

CAMO and Part-145 updates

Future outlook:

NPA 2025-12 Regular update of the CAW Rule, (ex RMT.0735)

- Improve the clarity and consistency of the rules
- Correct / clarify miscellaneous topics and 80 identified non-controversial issues
- Address outstanding items from rulemaking tasks (i.e. RMT.0096 and RMT.0217)
- Keep the rules consistent with the latest ICAO SARPs
- Support the digitalisation of certain processes
- Delete obsolete provisions (Part-M, Subpart-F and Subpart-G)
- Simplify specific provisions (replacing the list of aircraft type ratings included in Appendix I to AMC to Part-66 with a web-based version on the EASA website).
- Opinion by 2026-Q4, Decision expected in 2027

CAMO and Part-145 updates

Rules amendments - overview

– **No new amending Regulation published since last P&CA TeB meeting**

– **Amending Regulations with coming applicability :**

→ **Regulation (EU) 2025/111** (applicable 13 Feb 2026): CAW for electric- and hybrid-propulsion aircraft and other non-conventional aircraft

- → Introduction of category B1.E for electrical aeroplanes <5 700 kg MTOM
- → Introduction of OSD requirement for any other electrical/non-conventional aircraft, using relevant existing licence categories
- → Amendment of CMPA definition for CAW
- → AMC/GM under development target Q4/2025 (ref. rules development)

→ **Regulations (EU) 2023/203** (applicable 22 February 2026)

- → Management of cybersecurity risks for aviation safety for CAMO and P145 organisation* and competent authorities (including P66 licencing authority) (*except those solely involved with Part-ML aircraft)

– **Coming publication of amending Regulations** (from EASA committee June 2025 – RMT.0278/0521/0681):

- → COMMISSION DELEGATED REGULATION (EU) …/... of XXX amending Regulation (EU) No 748/2012 as regards certificate of airworthiness and restricted certificate of airworthiness
- → COMMISSION IMPLEMENTING REGULATION (EU) …/... of XXX amending Regulation (EU) No 1321/2014 and Regulation (EU) No 748/2012 as regards airworthiness review process, airworthiness certificate and occurrence reporting, and correcting Regulation (EU) No 1321/2014
- → Publication OJ expected beginning 2026 with applicability 20 days + 6 months after publication
- → AMC/GM under development target Q2/2026 (see section rules development)

CAMO and Part-145 updates

SASOC 2026

Rules development – overview (1/2)

Ongoing RMTs:

- **Unmanned Aircraft Systems** (RMT.0230)
  - NPA 2024-06: AMC/GM development to adopted Regs 2024/1107 and 2024/1109
  - These AMC/GM considered essential, representing novelties compared to the AMC/GM applicable to manned aircraft.
  - The remaining necessary AMC and GM are planned to be developed in a second phase of the RMT
  - Target EDD publication of AMC/GM: Q4/2025

- **New Air Mobility** (RMT.0731(1)) (ref. rules amendments)
  - AMC/GM development to adopted Reg. (EU) 2025/111
  - Target publication of AMC/GM: Q4/2025

- **Review of Part-147** (RMT.0544) (ref. agenda item 14)
  - NPA 2023-10: Improve structure/consistency of Part-147
  - address language proficiency & fraud
  - Target Opinion: Q1/2026

- **Digital licences** (RMT.0737)
  - Cross-domain task - contribution CAW for maintenance licences
  - NPA 2024-08: Not yet full visibility on the comments: 2 major commenters identified; P&CA TeB to be briefed before the Opinion
  - Target Opinion: Q2/2026

- **Import of Aircraft + AR + Occurrence Reporting** (RMT.0278/RMT.0521/RMT.0681)
  - NPA 2025-102 focus consultation for AMC/GM
  - These AMC/GM considered important to be (re)consulted
  - Comments under review
  - Target publication of AMC/GM: Q2/2026

- **Non-installed equipment** (RMT.0727(3)) (see details)
  - Cross-domain IAW+CAW task
  - NPA 2025-02 issued on 07 July 2025 - end of consultation extended to 07 Nov

CAMO and Part-145 updates

SASOC 2026

Rules development – overview (2/2)

Ongoing RMTs (continued):

- **Regular update of CAW Reg** (RMT.0735) (see details)
  - NPA Q4/2025
  - Selection of ≈80 topics
- **Artificial intelligence trustworthiness** (RMT.0742)
  - Cross-domain task - contribution CAW
  - NPA for a "Detailed Specification" (soft law) for risk assessment on use of AI: Q4/2025
  - NPA CAW: Q1/2026 – exact scope to be confirmed
- **CAW rules for airships** (RMT.0731(4A))
  - Objective: Review whether adaptations are necessary
  - Relaunch meeting held 19 Sep 2025
  - NPA Q4/2026

RMT/drafting to be (re)started:

- **B1/B2 certifying staff and support staff** (RMT.0097)
  - NPA 2014-11 – in stby due to priorities
  - Policy paper issued on EASA website
  - Opinion Q2/2027
- **ACAM** (RMT.0588)
  - ToR 2027
  - Policy paper under development (see details)
- **Component Certifying Staff**
  - Level playing field issue with the qualification
  - High level discussion with Member States having national licences (remaining bilaterals in November 2025)

Best Intervention Strategy (BIS) to be consulted soon:

- **Multi-transport-mode aircraft:**
  - Regulatory proposal for additional CAW considerations for aircraft subject to multi use (e.g. air & road)
- **Repetitive defects** (see details)
  - Light BIS – BIS 43 "SI-9001 Inadequate management of repetitive defects"

Management of Change

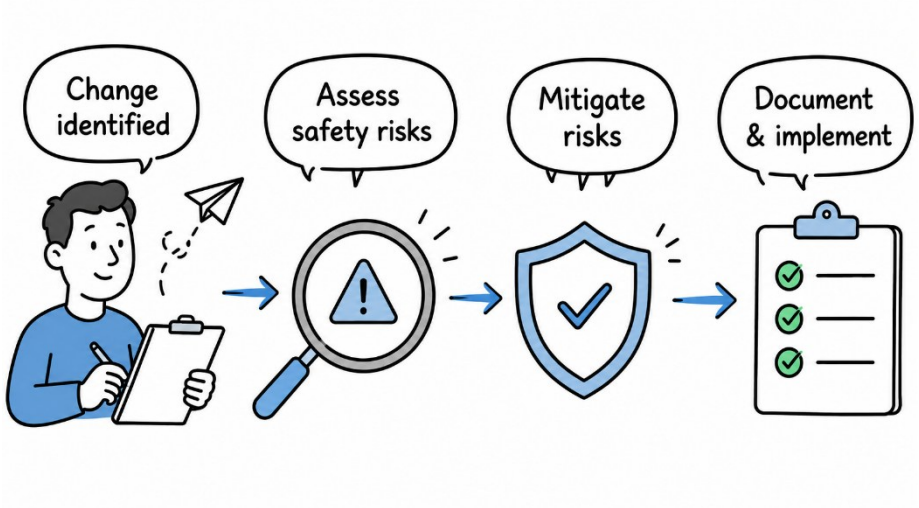
Andreas Boss

Management of Changes

Key points

Ensure all organisational changes are managed to identify, assess, and mitigate safety risks.

Use existing hazard identification and risk management processes.



Management of Changes

Why It Matters

Changes (e.g. structure, personnel, procedures) can introduce new hazards or increase risks.

Even small changes can have significant safety implications if not managed properly.

Management of Changes

Core Principles

All changes must be assessed, regardless of size

Responsibility lies with the team implementing the change, but:

- All affected personnel must be involved.

Evaluate:

- Scale of change
- Safety criticality
- Impact on human performance (Human Factor)

Management of Changes

Human Factors (HF)

Changes can affect performance and behaviour

Important to:

- Assess HF risks (e.g. workload, systems, processes)
- Focus on people within the system
- Special attention required during the transition period

Management of Changes

Supporting an Effective Process

Formal risk assessment for major changes

Identify impacts on:

- Resources (human & material)
- Policies, procedures, training
- Management control

Develop aviation-focused safety cases

Involve key stakeholders

Review existing hazards and previous risk assessments

Management of Changes

Bottom Line

Effective management of change = proactive, structured, and people-focused approach to maintaining safety

Management of Changes

What Information Should Be Analysed & Recorded

Think of the MoC record as answering three core questions:

1. What is changing?
2. What could go wrong?
3. What are we doing about it?

Management of Changes

What Information Should Be Analysed & Recorded

You can structure your record like this:

- Change description, scope & affected areas
- Hazard identification and risk assessment
- Human factors analysis
- Mitigation measures / residual risk
- Transition plan / implementation plan
- Monitoring & review
- Approval & sign-off

Management of Changes

What Information Should Be Analysed & Recorded

Change Description, clearly define the change:

- Nature of the change (technical, organisational, procedural, etc.)
- Reason / driver (regulation, business need, safety improvement, etc.)
- Scope and boundaries
- Whether it is minor or major

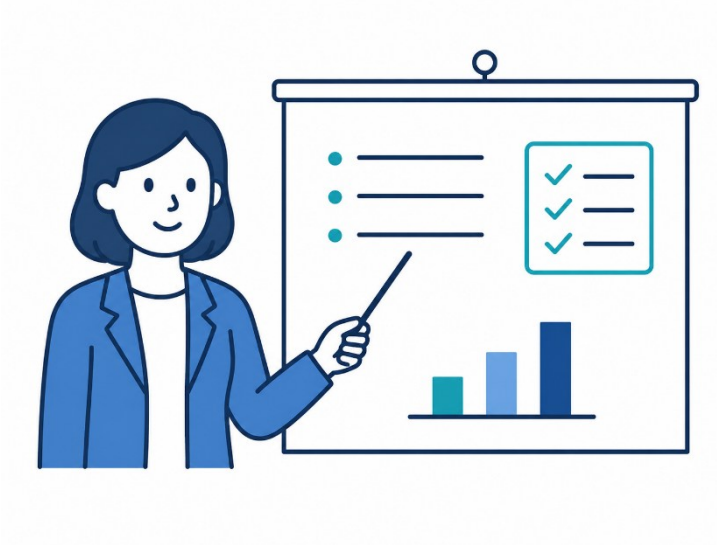
unclear change descriptions = weak risk assessments.

Management of Changes

What Information Should Be Analysed & Recorded

Change Description, areas affected

- Organisation structure
- Personnel (including key postholders)
- Facilities / locations
- Aircraft / scope of work
- Procedures & manuals
- Equipment / IT systems
- Subcontractors



Management of Changes

What Information Should Be Analysed & Recorded

Safety & Hazard Identification, document if

- Potential hazards are introduced by the change, or
- If any existing hazards are affected or worsened

Examples:

- Loss of competence
- Communication breakdown
- Increased workload
- Interface risks between teams or subcontractors

Management of Changes

What Information Should Be Analysed & Recorded

Risk Assessment for each hazard:

- Likelihood and severity
- Risk classification (before mitigation)
- Reference to your SMS risk matrix

consistent with your existing SMS methodology

Management of Changes

What Information Should Be Analysed & Recorded

Human factors assessment is required explicitly, record impact on:

- Workload / Fatigue
- Training / competence
- Human-machine interaction (IT, tools, automation)
- Communication and coordination
- Organisational culture

Management of Changes

What Information Should Be Analysed & Recorded

Impact Analysis, assess broader consequences:

- Operational impact
- Airworthiness impact
- Compliance impact (regulations, approvals)
- Impact on continuing airworthiness management activities

Management of Changes

What Information Should Be Analysed & Recorded

Mitigation Measures, define:

Actions to reduce risks, preventive and corrective controls

Examples:

- Additional training
- Phased implementation
- Procedure updates
- Increased supervision / system testing / validation

Management of Changes

What Information Should Be Analysed & Recorded

Residual Risk Evaluation

Risk level after mitigation and justification that risk is acceptable

Who performed the assessment

Who was consulted (engineering, quality, safety, HF, etc.)

Accountable manager / nominated person approval

Management of Changes

What Information Should Be Analysed & Recorded

Transition Plan - very important to show how the change will be introduced

- Timeline, key milestones, dependencies communication
- Controls during the transition period
- Temporary measures (e.g. parallel systems, extra checks)

Management of Changes

What Information Should Be Analysed & Recorded

Monitoring & Follow-Up, define how you will verify success:

- Safety performance indicators (SPIs)
- Audits or reviews
- Feedback from personnel
- Occurrence reporting trends

Thank you for your feedback / questions

Example of Management of Change

MANAGEMENT OF CHANGE (MoC) FORM

Introduction of a New Aircraft Type - Leonardo AW169

Illustrative example prepared for presentation purposes. Not an official approval, certificate or binding FOCA/BAZL decision.

Document Status	Example / Training Version
MoC Reference	MOC-2026-017
Organisation	XYZ CAMO Ltd
Competent Authority	FOCA / BAZL
Date Initiated	15 March 2026
Change Owner	Continuing Airworthiness Manager (CAM)

1. General Information

Change Description	Introduction of the Leonardo AW169 into the CAMO scope of approval, currently managing Airbus H135 fleet.
Reason for Change	New customer contract requiring full CAMO support for one AW169 helicopter.

2. Change Classification

☑ **Safety Significant Change**	☐ **Minor Administrative Change**
Justification	The introduction of a new aircraft type impacts personnel competence, maintenance programme management, contracted maintenance, and safety risk profile.

3. Scope of Impact

☑ Personnel & Competence	☑ Continuing Airworthiness Management Exposition (CAME)
☑ Maintenance Programme (AMP)	☑ Airworthiness Review Process
☑ IT Systems / Aircraft Tracking Tools	☑ Subcontracted Maintenance (Part-145)
☑ Safety Management System (SMS)	

4. Detailed Impact Assessment

4.1 Personnel & Competence

Assessment	• No current staff holds AW169 type training • Airworthiness Review Staff (ARS) not authorised for this type
Impact	HIGH
Mitigation	• Type training to be completed for 2 engineers and 1 ARS • Competence assessment prior to authorisation

4.2 Documentation & Technical Data

Assessment	• AMP for AW169 to be developed and approved • MEL, ADs, SBs to be introduced into document system
Impact	MEDIUM
Mitigation	• Use OEM baseline AMP • Independent review prior to release

4.3 IT Systems

Assessment	• Existing tracking software compatible with AW169
Impact	LOW
Mitigation	• Validation of data entry through test aircraft profile

4.4 Subcontractors

Assessment	• No existing Part-145 contract for AW169
Impact	HIGH
Mitigation	• Selection of approved Part-145 organisation • Contract and MOE approval review

4.5 Workload & Resources

Assessment	• Increase in workload estimated at +15%
Impact	MEDIUM
Mitigation	• Temporary workload redistribution • Recruitment planned if fleet expands

5. Safety Risk Assessment

Hazard	Risk	Severity	Likelihood	Mitigation
Lack of type knowledge	Maintenance errors	Major	Medium	Training + supervision
Incorrect AMP implementation	Non-compliance	Major	Low	Independent review
Wrong AD applicability	Airworthiness risk	Major	Low	Dual verification

6. Action Plan

Action	Responsible	Due Date	Status
Staff type training	CAM	30 April 2026	Open
AMP development	Technical Manager	15 April 2026	Open
CAME revision	Compliance Monitoring Manager	20 April 2026	Open
Part-145 contract	CAM	25 April 2026	Open
Internal audit	Compliance Monitoring	30 May 2026	Planned

7. CAME Update

- Include AW169 in scope of approval
- Define competence requirements
- Update procedures related to AMP and ARS

Submission route: Submitted to EASA / Competent Authority for review.

8. Approval

Role	Name / Function	Decision	Date	Signature
Safety Manager		Approved		
Compliance Monitoring Manager		Approved		
Accountable Manager		Approved		
Competent Authority	FOCA / BAZL	☑ Required ☐ Not Required		

9. Implementation Plan

- Entry into service planned: 01 May 2026
- Initial phase under enhanced monitoring (first 3 months)
- Weekly internal review meetings

10. Post-Implementation Review

- Internal audit after 1 month
- Safety review after 3 months
- Feedback from staff collected and analysed

11. Closure Criteria

- All actions completed
- No major findings from audit
- Stable operation demonstrated

12. Auditor Review Focus

A document like this is stronger when risks are realistic, mitigations are measurable and assigned, hazard-to-action traceability is clear, and SMS is actively integrated rather than only mentioned.

13. Document Control

Version	Date	Prepared by	Purpose
0.1	07 May 2026	FOCA / BAZL - Example Material	Presentation sample only

Example good / bad MoC

BAZL | FOCA

Bad MoC vs Good MoC

CAMO - Introduction of a New Helicopter Type

Presentation / training example. This comparison shows what auditors typically regard as a weak versus a strong Management of Change (MoC) for introducing a new helicopter type into a CAMO environment.

Topic	Bad MoC	Good MoC
1. Change Description	"Addition of new helicopter to fleet." *Too vague, no scope, no context*	"Introduction of one Leonardo AW169 into CAMO scope, including AMP development, ARS authorisation, and Part-145 subcontracting." *Clear, auditable, and complete*
2. Impact Assessment	• "Training required" • "Documentation to be updated" *Generic, copy-paste, no depth*	• No internal AW169 type-rated personnel identified • AMP to be created from OEM baseline and approved before entry into service • No existing Part-145 contract covering AW169 *Specific, factual, verifiable*
3. Risk Assessment (SMS)	• Risk: "Human error" • Mitigation: "Be careful" *Classic audit finding*	• Hazard: Lack of AW169 technical knowledge • Risk: Incorrect maintenance planning leading to non-compliance • Mitigation: • Type training before EIS • Dual check of first AMP implementation • Audit after 1 month *Structured, measurable, SMS-compliant*
4. Link to Reality	• Written by Compliance only • No input from Planning, Engineering or Safety *Disconnect between paper and operations*	• Inputs from CAM, Safety Manager, Planning Engineer and Compliance Monitoring *Reflects the actual organisation and its interfaces*
5. Action Plan	• "Train staff" • "Update documents" *No responsibility, no deadlines*	Action / Responsible / Due Date: • AW169 Type Training / CAM / 30 Apr • AMP Approval / Tech Manager / 15 Apr • Internal Audit / Compliance / 30 May *Trackable and auditable*
6. CAME Update	"CAME will be updated if needed." *Red flag for auditors*	"CAME Section 1.9 (Scope of Work) and Section 3.4 (Competence) revised to include AW169 operations and training requirements." *Precise and controlled*

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Topic	Bad MoC	Good MoC
7. Implementation Monitoring	• No follow-up *Change is approved and forgotten*	• 3-month enhanced monitoring period • Weekly reviews during first month • Post-implementation audit *Shows control of the change*
8. Closure	• Closed immediately after approval *No evidence of effectiveness*	• Closure only after all actions are completed • Audit performed • No major findings • Stable operation demonstrated

What Auditors Actually Look For

- Evidence that you thought about the risks
- Proof that actions are implemented, not just written
- A real connection with your SMS
- Consistency with your actual operations

Typical Findings (Real Life)

- MoC performed after the change (too late)
- Risks copied from another MoC
- No competence assessment
- No link to AMP or AD management
- No post-implementation review

For presentation use. Sample wording only; adapt to organisation-specific procedures and authority requirements.

Example Part-IS Asset Inventory

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Sample Asset Inventory

CAMO + Part-145 | Part IS Presentation Example

Illustrative asset inventory showing aviation-critical software, data, hardware, network components and third-party services. CIA = Confidentiality / Integrity / Availability.

Asset ID	Asset Name	Type	Function	Business Owner	Technical Owner	Location	CIA (C/I/A)	Criticality	Notes
SW-001	Airworthiness Tracking System	Software (SaaS)	AD/SB, AMP, status tracking	CAM	IT Manager	Cloud (EU)	H/H/H	Critical	Core CAMO system
DATA-001	AMP Database	Data	Maintenance programme data	CAM	IT	Cloud	H/H/H	Critical	Linked to aircraft MSN
DATA-002	AD Compliance Records	Data	Airworthiness compliance	CAM	IT	Cloud	H/H/H	Critical	Regulatory evidence
SW-002	Electronic Tech Log System	Software	Aircraft technical log	Part-145 Manager	IT	Cloud	H/H/H	Critical	Operational data
HW-001	CAMO Server (if hybrid)	Server	Local data storage	IT Manager	IT	Data center	M/H/H	High	Backup node
HW-002	Engineer Laptop (Admin Access)	Hardware	Maintenance/CAMO tasks	Part-145 Manager	IT	On-site	H/H/M	High	Elevated privileges
HW-003	Planning Engineer Laptop	Hardware	Maintenance planning	CAM	IT	Office	M/H/M	High	Access to tracking system
SW-003	Maintenance Planning Tool	Software	Work package planning	CAM	IT	Cloud	H/H/H	Critical	Linked to AMP
SW-004	Document Management System	Software	Stores manuals, CAME, MOE	Compliance Manager	IT	Cloud	H/H/M	High	Controlled docs
DATA-003	Aircraft Technical Records (Digital)	Data	Full aircraft history	CAM	IT	Cloud	H/H/H	Critical	Long-term retention
DATA-004	Work Orders & CRS Records	Data	Part-145 release to service	Part-145 Manager	IT	Local/Cloud	H/H/H	Critical	Legal records
HW-004	Hangar Workstation	Hardware	Maintenance input	Part-145 Manager	IT	Hangar	M/M/M	Medium	Shared device
NET-001	Internal Network Infrastructure	Network	Connectivity	IT Manager	IT	On-site	M/H/H	High	Includes firewall
SEC-001	Firewall Appliance	Security Device	Network protection	IT Manager	IT	On-site	H/H/H	Critical	Perimeter control
SW-005	Email System (e.g. M365)	Software	Communication	All departments	IT	Cloud	M/M/H	High	Phishing risk
DATA-005	Personnel Authorisation Records	Data	Staff competence & approvals	Compliance Manager	IT	Cloud	H/H/M	High	ARS, certifying staff
EXT-001	Cloud Hosting Provider	Service	Data hosting	Accountable Manager	IT	EU	H/H/H	Critical	Third-party risk
EXT-002	Part-145 Subcontractor System Access	External Service	Maintenance input	Part-145 Manager	IT	External	H/H/M	High	Controlled access
SW-006	Backup System	Software	Data backup & recovery	IT Manager	IT	Cloud/Local	H/H/H	Critical	Ransomware mitigation
DATA-006	Safety Reports Database (SMS)	Data	Occurrence reporting	Safety Manager	IT	Cloud	H/M/M	High	Supports SMS interface

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Why This Inventory Is "Good"

✓ Reflects real aviation operations
- AMP, AD tracking, CRS, tech logs
- Both continuing airworthiness and maintenance
- Asset scope follows operational dependencies

✓ Includes all asset types
- Hardware
- Software
- Data
- Network
- External services

✓ Defines clear ownership
- Business owner = accountability
- Technical owner = control
- Supports follow-up and remediation

✓ Integrates cybersecurity
- CIA triad per asset
- Direct link to risk assessment
- Supports backup, access and monitoring controls

✓ Includes third-party risks
- Cloud provider
- Part-145 subcontractor access
- Data hosting location and supplier exposure

✗ What a Bad Version Would Miss
- Lists only "servers and laptops"
- Ignores AMP / AD / records
- No owners or classification
- No external providers
- No link to operations

A weak inventory would likely trigger findings under Part IS because it fails to connect information security controls with aviation-critical operations.

For presentation use. Sample wording only; adapt ownership, criticality and controls to the actual organisation.

Example Part-IS Asset Inventory (good/bad)

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❌ Bad vs ☑ Good Asset Inventory (Part IS)

Presentation Comparison | CAMO / Aviation Information Security Context

Presentation / training example. This comparison shows what a weak versus a strong Asset Inventory typically looks like in a Part IS environment, with a focus on aviation-relevant assets and operational reality.

Topic	❌ Bad Asset Inventory	☑ Good Asset Inventory
1. Definition of Assets	• Only IT equipment listed Example: o "Laptop" o "Server" o "Printer" *Missing: data, software, critical aviation systems, third parties*	Includes ALL relevant asset types: • Hardware (laptops, servers, tablets) • Software (maintenance tracking system, email) • Data (AMP, AD status, tech records) • Services (cloud providers, CAMO software) • People (key roles with privileged access) *Reflects operational reality*
2. Level of Detail	Asset / Owner Server / IT *Too generic, not usable*	Asset ID / Asset Name / Type / Owner / Location / Criticality IT-001 / CAMO Server (Prod) / Server / IT Manager / Data Center / High SW-003 / Airworthiness Tracking System / Software / CAM / Cloud (EU) / Critical *Precise, traceable*
3. Link to Aviation Operations	• No link to continuing airworthiness • No mention of AMP / AD / records *Major gap in aviation context*	Clearly identifies aviation-critical assets: • AMP database • AD/SB tracking system • Electronic Tech Logs • Digital aircraft records *Directly supports CAMO compliance*
4. Ownership	• "IT Department" owns everything *No accountability*	• Business owner + technical owner defined Example: • Business Owner: CAM • Technical Owner: IT Manager *Clear responsibility*

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Topic	❌ Bad Asset Inventory	☑ Good Asset Inventory
5. Classification & Criticality	• No classification *Impossible to protect properly*	Each asset classified: • Confidentiality: Low / Medium / High • Integrity: Low / Medium / High • Availability: Low / Medium / High Example: AD tracking system → High / High / High *Enables proper risk assessment*
6. Cybersecurity Relevance	• No link to risks *Inventory is just a list*	Inventory supports risk management: • Identifies attack surface • Links to risk register • Supports controls (backup, access control, etc.)
7. Third Parties / Cloud	• No cloud or supplier assets listed *Very common finding*	Includes: • Cloud providers (e.g. CAMO software SaaS) • External IT support • Data hosting location *Covers supply chain risk*
8. Maintenance of Inventory	• Created once, never updated *Quickly obsolete*	• Regular review (e.g. annually or after change) • Linked to Management of Change (MoC) *Always up to date*

🧠 Example (Concrete Aviation Assets)

- Bad: "Computer system" / "Software" / "Database"
- Good: CAMO Airworthiness Tracking Software (cloud-based)
- Good: AMP Database (linked to aircraft MSN)
- Good: AD Compliance Records
- Good: Electronic Tech Log System
- Good: Shared Drive – Aircraft Records
- Good: Engineer Laptop (with admin rights)

⚠ Typical Part IS Findings

- Asset inventory limited to IT hardware
- No data classification
- No asset owner
- Missing aviation-critical systems
- No link to risk assessment
- Cloud services ignored

🍀 What Makes It "Audit-Proof"

- ✓ Is complete (not just IT)
- ✓ Is linked to operations (CAMO!)
- ✓ Has owners and classification
- ✓ Is used in risk assessment
- ✓ Is maintained over time

For presentation use. Sample wording only; adapt to your organisation, asset taxonomy and Part IS implementation.