

NPA/26/07

Title of Proposal: NPA for RA’s 4947, 4951, 4955 and 4966

RA(s) or Manual Chapter(s): RA 4947, RA 4951, RA 4955 and RA 4966

Organizations and / or business sectors affected: All organizations to which RA’s 4947, 4951, 4955 and 4966 apply.

RFC Serial No: MAA/RFC/2025/059, 2025/144 and 2025/147

MAA Author

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N/A	N/A	N/A	N/A

Cross-references to Other Documents or Relevant Sources

Other MRP Amendments: N/A

Service Inquiry Recommendations: N/A

AAIB Recommendations: N/A

Other Investigation Recommendations: N/A

Any Other Document: N/A

Feedback Notes for the Regulated Community

The Regulated Community are invited to offer feedback about the proposed amendment in the following areas:

- Air or Flight Safety impact
- Operational impact
- Errors or omissions
- Timescale for implementation
- Cost of implementation
- Amendment to internal processes/orders
- Resourcing the outcome of change
- (Contract amendments because of the change)

The format for feedback is available within a single Excel Template file on both internal and external MAA websites; it is important to use this format to ensure that your responses are considered and answered correctly.

Summary of Proposed Amendment

Objective: .

Changes made:

RA 4947

Changes to terminology and abbreviation of terms throughout.

Amendment of Quality System (QS) to Quality Management System (QMS).

Inclusion of AMC in reference to Aircraft Cross Maintenance.

Amendment of Para 15 to replace Aviation Duty Holder (ADH) with Delivery Duty Holder (DDH).

Amendment of Para 16 to remove service life limited and replace with certified life limit.

Addition of footnote 9 from Para 11 referencing RA 4800.

Addition of footnote 10 from Para 11 referencing MAA recognition.

Amendment of Para 22 to remove term “reoccurrence” and replace with “likelihood of repetition of the Occurrence.”

Removal of Para’s 26-32 & 34 as contained Nil content.

RA 4951

Changes to terminology and abbreviation of terms throughout.

Amendment of Quality System (QS) to Quality Management System (QMS).

Addition of AMC at Para 1d to permit the appointment of a QM who is not yet fully qualified through local authorization (DDH) or via MAA Waiver Process (AM(MF)).

Addition of AMC at Para 7 mandating the Mil CAMO QMS to operate as part of the parent ASAM and documenting it in the Continuing Airworthiness Management Exposition.

Addition of footnote 4 from Para 7 referencing RA 1200.

Addition of footnote 8 from Para 21 referencing RA 1005.

RA 4955

Changes to terminology and abbreviation of terms throughout.

Significant rewrite of RA 4955 to harmonise with RA 4821 which covers Findings for Maintenance Organizations.

Addition of AMC 4955(1) requiring the Mil CAM to take containment action where necessary and provide CAPs for MAA findings iaw MAA03.

Expansion of footnote 1.

Addition of footnote 3 from Para 4 referring to MAA03.

Addition of GMC 4955(1) Para 5 and 6 providing definitions of Level 1 and Level 2 non-compliances and non-conformances, and further information regarding issues or work identified as part of an Aircraft Product Sample (APS) report.

Addition of GMC 4955(1) Para 7, 8 and 9 surrounding Root Cause Analysis (RCA).

Addition of 4955(2) Corrective Actions

Addition of 4955(2) AMC Para 10 and 11 regarding requirements for Corrective Action Plans (CAP).

Addition of 4955(2) GMC Para 12 regarding when CAPs generated in response to an APS report Annexe A do not need submitting to the MAA.

Addition of 4955(3) Observations

Addition of 4955(3) AMC Para 13 and 14 detailing how the Military Continuing

Airworthiness Manager (Mil CAM) should handle negative findings identified by the MAA. Addition of 4955(4) GM Para 15 noting the Observation handling process may follow a similar process to that of findings by the Mil CAM.

RA 4966

Changes to terminology and abbreviation of terms throughout.

Amendment of 4966(1) AMC Para 8 providing clarity on the subject of Military Continuing Airworthiness Management Instructions (Mil CAMI) and including the Accountable Manager (Military Flying) (AM(MF)) in the list of persons to be engaged.

Amendment of 4966(2) AMC Pata 18b to include AM(MF) and Type Airworthiness Manager (TAM).

Impact Assessment: Low

Consultation Period Ends: 30 March 2026

The consultation period for this proposed amendment ends on the stated date. Please send your feedback, using the Response Form, via email to DSA-MAA-MRPEnquiries@mod.gov.uk

MAA Approval

Post	Name	Rank	Signature
DSA-MAA-OpAssure-Eng-DepHd	Redacted	Redacted	Redacted - Original Signed

RA 4947 - Continuing Airworthiness Management - MRP Part M Subpart G

Rationale

*For a Military Continuing Airworthiness Management Organization (Mil CAMO) to be approved by the MAA it will have adequate procedures for ensuring the Continuing Airworthiness Management of its Air Systems. If these procedures do not address all of the tasks required to maintain Airworthiness, an Air System could be released for flight in a non-airworthy condition. This RA identifies the minimum activity **► required for ◀ a Mil CAMO ► ◀ to ensure the Airworthiness of Air Systems in their Area of Responsibility, ► and to support the Air Safety Management System (ASMS), and provide Continuing Airworthiness (CAW) evidence into the Air System Safety Case (ASSC). ◀***

Contents

4947(1): Military Continuing Airworthiness Management Organization Responsibilities

Regulation 4947(1)

Military Continuing Airworthiness Management Organization Responsibilities

- 4947(1) For all Air Systems within the organization's Continuing Airworthiness Management Exposition (CAME), the approved Mil CAMO **shall**:
- a. Develop and control an Aircraft Maintenance Programme (AMP), support any applicable reliability programme and propose amendments and additions to the Maintenance schedule to the Type Airworthiness Authority (TAA)¹.
 - b. Manage the embodiment of Modifications and Repairs.
 - c. Ensure that all Maintenance is carried out to the required Quality and in accordance with (iaw) the AMP, and correctly released^{2,3}.
 - d. Ensure that all applicable Special Instructions (Technical) (SI(T)) have their requirements fulfilled.
 - e. Ensure that Military Maintenance Organizations (MMOs) and / or MRP Part 145 Approved Maintenance Organizations (AMOs) correctly manage Faults reported, or discovered, during scheduled Maintenance².
 - f. Co-ordinate scheduled Maintenance, fulfilling the requirements of SI(T)s and the replacement of **► parts that have reached their certified life limit. ◀**
 - g. Manage and archive all CAW records and the operator's technical log.

¹ Where the Air System is not UK MOD-owned, Type Airworthiness (TAW) management regulatory Responsibility by either the TAA or Type Airworthiness Manager (TAM) needs to be agreed within the Sponsor's approved model; refer to RA 1162 – Air Safety Governance Arrangements for Civilian Operated (Development) and (In-Service) Air Systems, or refer to RA 1163 – Air Safety Governance Arrangements for Special Case Flying Air Systems. Dependent on the agreed delegation of TAW Responsibilities TAM may be read in place of TAA as appropriate throughout this RA..

² Refer to RA 4812 – Certification of Air System Release and Component Release (MRP 145.A.50).

³ Refer to RA 4961 – Aircraft Maintenance Programme and Military Continuing Airworthiness Management Organization Responsibilities for Air System release - MRP Part M Subpart C.

**Regulation
4947(1)**

- h. Conduct Assurance that the weight and moment statement reflects the current status of the Aircraft.
- i. Initiate and coordinate any necessary actions and follow-up activity highlighted by an Occurrence report.

**Acceptable
Means of
Compliance
4947(1)**

Military Continuing Airworthiness Management Organization Responsibilities

4947(1)

1. For those Mil CAMOs which use Civil Aviation Authority Approved organizations via a Contracted arrangement⁴, the Mil CAM **should** rigorously demonstrate what Assurance and control measures will be employed by the Mil CAMO to ensure the Airworthiness of the Air System for any CAW Responsibilities conducted by other parties⁵.

4947(1)a

2. For all Air Systems within the organization's CAME, the approved Mil CAMO **should** refer to RA 4961³.

3. The Military Continuing Airworthiness Manager (Mil CAM) **should** support the TAA with CAW decisions when an Out of Service Date Extension Programme is being developed. Specific consideration **should** be given to any previous cost benefit analysis on Modifications not carried out⁶.

4947(1)b

4. For all Air Systems within the organization's CAME, the approved Mil CAMO **should** refer to RA 4963⁷.

4947(1)c

5. For all Maintenance activity the Mil CAMO **should** agree the work package content with the Maintenance Organization (MO) conducting the work and receive Assurance of its satisfactory completion.

6. The Mil CAMO **should**:

- a. Facilitate access for the MO to the applicable current Approved Data, including that relating to Modifications and Repairs.
- b. Be responsible for the management and oversight of any issues arising from Maintenance including the delivery and acceptance processes.
- c. Conduct input and output meetings for each Air System to establish the required Maintenance (including any applicable Modifications, Repairs, SI(T)s and upgrades) and receive Assurance of its satisfactory completion.
- d. Manage the completion or deferment of emergent work, seeking and obtaining Technical Information (TI).

7. The Mil CAMO **should** maintain an airworthy fleet, and conduct Assurance on the standard of output from any MO.

- a. Where the Mil CAMO and MO share the same Quality ► Management ◀ System ► (QMS), ◀ this could be achieved through the internal ► QMS ◀ process. For Contracted organizations, the Mil CAMO **should** ensure appropriate Contract cover is in place to provide equivalent levels of Assurance.
- b. Where the Mil CAMO and MO do not share the same ► QMS, ◀ such Assurance **should** be achieved through either formal visits to the organization or external 2nd / 3rd party Assurance or Auditing.

⁴ Refer to RA 1165 – UK Civil Aviation Authority Oversight of UK Military Registered ► Aircraft. ◀

⁵ Refer to RA 4956 – Military Continuing Airworthiness Management Organization Tasks Performed by Other Organizations – MRP Part M Subpart G.

⁶ Refer to RA 5725 – Out of Service Date Extension Programme.

⁷ Refer to RA 4963 – Modifications and Repairs – MRP Part M Subpart C.

**Acceptable
Means of
Compliance
4947(1)**

8. The Mil CAM **should** conduct Assurance of the support Contract and framework where the Air System and / or component Maintenance has been Contracted out to an MO on behalf of the CAMO by a Contracting agent (eg Delivery Team (DT)).

9. The Mil CAMO **should** acknowledge receipt if notified by a MO that they intend to deviate from TI². The Mil CAMO **should** consider the implications, providing comment on the deviation with a view to advising appropriate remedial action.

4947(1)d

10. For all Air Systems within the organization's CAME, the approved Mil CAMO **should** refer to RA 4962⁸.

4947(1)e

11. The Mil CAMO **should** ensure the use of a ► **Competent** ◀ MO to conduct Corrective Maintenance. The Mil CAMO **should** conduct Assurance to check that the MOs use appropriately Authorized personnel for the tasks. ► **This includes MMOs of foreign nations conducting Aircraft Cross Maintenance (ACM)⁹ on UK Military Air Systems. The Mil CAMO should ensure that any necessary arrangements for ACM are specifically detailed in the CAME, with appropriate reference to associated formal Recognition¹⁰ documentation.** ◀

12. The Mil CAMO **should** review Limitations / Acceptable Deferred Faults to:

- a. Highlight and address adverse trends, notifying these to the TAA, Delivery Duty Holder (DDH) or Accountable Manager (Military Flying) (AM(MF)) as appropriate.
- b. Identify any cumulative Risk.
- c. Ensure that, for out-of-limits Faults and damage, advice has been sought from the TAA on Airworthiness Risk.

13. The Mil CAMO **should** ensure that a register is maintained of reported instances of Air Systems displaying Uncommanded Flying Control Movements, Control Restrictions or other abnormal flying characteristics, with any detected trends being thoroughly investigated¹¹.

4947(1)f

14. The Mil CAMO **should** plan and control all Maintenance activity, including the use of latitudes, deferments or Concessions as part of the fleet management task.

15. The Mil CAMO **should** inform the ► **DDH** ◀ or AM(MF) if there are any significant aspects of Maintenance that cannot be carried out and advise of the implications.

16. Where a ► **part's certified life limit** ◀ cannot be ascertained, the Mil CAMO **should** ensure that it is not used until such life can be determined, recovered or the part disposed of.

4947(1)g

17. For all Air Systems within the organization's CAME, the approved Mil CAMO **should** refer to RA 4964¹².

4947(1)h

18. The Mil CAMO **should** conduct Assurance of the weight and moment statement to check that it reflects the current status of the Air System.

4947(1)i

19. The Mil CAMO **should** maintain oversight of Occurrence reports¹³ raised and subsequent action. Occurrence reports include, but are not limited to, Defence Air

⁸ Refer to RA 4962 – Special Instructions (Technical) – MRP Part M Subpart C.

⁹ ► Refer to RA 4800 – General Requirements (MRP Part 145).

¹⁰ Recognition is the process used to evaluate other Military aviation regulators and assess the potential to use their Airworthiness outputs within MAA processes, see [MAA Recognition](#). ◀

¹¹ Refer to RA 4061 – Air Systems Displaying Abnormal Flying Characteristics.

¹² Refer to RA 4964 – Continuing Airworthiness Management Records – MRP Part M Subpart C.

¹³ Refer to RA 1410 – Occurrence Reporting and Management.

**Acceptable
Means of
Compliance
4947(1)**

Safety Occurrence Reports (DASORs), Narrative Fault Reports and Serious Fault Reports.

20. The Mil CAMO **should** report to the TAA, any identified condition of an Air System, component or Maintenance procedure that endangers Air Safety as identified by the Mil CAMO.

21. Where an Air System Occurrence report has an Airworthiness aspect, the Mil CAMO **should** ensure the investigation of the Occurrence and subsequent recovery of the Air System (including any associated components) is robust.

22. Where the Occurrence report has a CAw implication for the fleet, the Mil CAMO **should** ensure that appropriate remedial action is taken to minimize ► **the likelihood of repetition of the Occurrence.** ◀ This could include:

- a. Changes to the AMP.
- b. Addressing Human Factors issues (which could include training, working conditions, etc).

23. Where the Occurrence report has a TAw implication the Mil CAMO **should** confirm that appropriate remedial action is being taken by the TAA / Original Equipment Manufacturer. This could be achieved by:

- a. Raising a MOD Form 760¹⁴ or equivalent.
- b. Identifying the requirement for a Follow Up Report to the Occurrence report to be carried out by the TAA¹³.

24. The Mil CAMO **should** ensure that appropriate follow-up activity to relevant Occurrence reports is completed, keeping the DDH or AM(MF) apprised of any significant Airworthiness issues. This includes ensuring the satisfactory completion of the Maintenance aspects of the Air System's DASOR.

**Guidance
Material
4947(1)**

Military Continuing Airworthiness Management Organization Responsibilities

4947(1)

25. MRP Part M Subpart C is designed to directly support the Airworthiness tasks required by this RA. Compliance with Subpart C is necessary to achieve an Approval for MRP Part M Subpart G. Consequently, a separate Subpart C Approval is not required.

4947(1)a

26. Nil.

4947(1)b

27. Nil.

4947(1)c

28. Nil.

4947(1)d

29. Nil.

4947(1)e

30. Nil.

4947(1)f

31. Nil.

4947(1)g

32. Nil.

¹⁴ Refer to MOD Form 760 – Narrative Fault Report.

**Guidance
Material
4947(1)****4947(1)h**

33. Although assured by the Mil CAMO, the Mil CAMO itself is not responsible for carrying out the weighing activity.

4947(1)i

34. Nil.

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RA 4951 - Quality ► Management ◀ System - MRP Part M Subpart G

Rationale

An effective Quality ► Management ◀ System ► (QMS) ◀ is a vital element of the Military Continuing Airworthiness Management Organization (Mil CAMO) and underpins the Continuing Airworthiness of all the Air Systems identified in the Continuing Airworthiness Management Exposition (CAME). Regardless of who or where Subcontracted Airworthiness tasks are being conducted, the purview of the ► QMS needs ◀ to encompass all activities and relevant supporting organizations to ensure the Airworthiness management of its Air Systems is at the required standard. Unmonitored or unassured activity can lead to a loss of configuration, which could significantly increase the Risk to Life ► ◀. This RA provides for the establishment of an independent ► QMS ◀ and Mil CAMO Quality Manager (Mil CAMO QM) which is essential Assurance activity for sustaining Airworthiness of Air Systems and ensuring Air Safety.

Contents

4951(1): Establishing a Quality ► Management ◀ System

4951(2): Functions of the Quality ► Management ◀ System

4951(3): Retention of Quality ► Management ◀ System Records

Regulation

4951(1)

Establishing a Quality ► Management ◀ System

4951(1) The Military Continuing Airworthiness Manager (Mil CAM) **shall** establish an independent ► QMS ◀ and designate a Mil CAMO QM to monitor compliance with, and the adequacy of, procedures required to ensure Airworthy Air Systems. Compliance monitoring **shall** include a feedback system to the Delivery Duty Holder (DDH) or Accountable Manager (Military Flying) (AM(MF)) to ensure corrective action is completed as necessary.

Acceptable Means of Compliance

4951(1)

Establishing a Quality ► Management ◀ System

1. The Mil CAM **should** appoint a Mil CAMO QM. The Mil CAMO QM **should**:
 - a. Be able to demonstrate ► ◀ direct access to the DDH or AM(MF) on matters concerning the ► QMS, ◀ with that relationship reflected in the CAME.
 - b. Highlight non-compliances and poor standards to the Mil CAM.
 - c. Be responsible for follow up or closure of any ► QMS ◀ findings.
 - d. Have successfully completed all relevant Air Safety training courses¹. ► If the designated QM is not yet fully qualified, the relevant DDH / AM(MF) **should** consider the additional residual Risk introduced by the appointment and;
 - (1) For Persons supporting an Aviation Duty Holder, the relevant Operating Duty Holders' Chief Air Engineer (CAE) **should** authorize non-compliance on a case-by-case basis, informing the MAA².
 - (2) For Persons supporting an AM(MF), the applicable AM(MF) **should** endorse non-compliances, and submit them to the MAA for Authorization via a Waiver application³. ◀
 - e. Have a thorough knowledge of the organization's CAME.
 - f. Where they are non-Crown Servants, have their appointment endorsed by the MAA through the submission and Approval of a MAA MAOS / CAMO Form 4⁴.

¹ Refer to RA 1440 – Air Safety Training.

² DSA-MAA-OA-ACC@mod.gov.uk.

³ ► Refer to MAA03 Annex B: Air Safety Alternative Acceptable Means of Compliance, Waivers and Exemptions. ◀

⁴ Refer to the MAOS / CAMO Form 4 – Details of Nominated Personnel ► which can be found on the MAA website: <https://www.gov.uk/government/publications/regulatory-article-ra-4806-personnel-requirements-mrp-145a30>. ◀

Acceptable Means of Compliance 4951(1)

2. The scope of the ►QMS◄ **should** cover all Continuing Airworthiness activities including those Subcontracted.
3. Procedures **should** be subject to periodic review. It is the Responsibility of all personnel to report any difficulties with the procedures via their organization's internal feedback mechanisms.
4. The feedback part of the system **should** address who is required to rectify any non-compliance in each particular case and the procedure to be followed if rectification is not completed within appropriate timescales; the feedback system **should** be directed to the DDH or AM(MF) through the Mil CAM.
5. The independent Quality Audit reports **should** be sent to the relevant department for rectification action giving target deadline dates. These dates **should** have been previously discussed with the department. The relevant department is required to rectify findings and inform the Mil CAMO QM or the Quality Auditor of such rectification.
6. The Mil CAM **should** hold regular meetings with corrective action plan owners to check progress on rectification. Such meetings may be delegated on a routine basis to the Mil CAMO QM, subject to the Mil CAM meeting at least twice per year with the personnel involved to review the overall performance.
7. ►The Mil CAMO QMS **should** operate as an integrated part of its parent organization's Air Safety Management System (ASMS)⁵, and any necessary implementing arrangements **should** be clearly articulated in the CAME.◄

Guidance Material 4951(1)

Establishing a Quality ►Management◄ System

8. The Mil CAMO ►QMS◄ may be combined with the ►QMS◄ of other Service or MAA-approved organizations if appropriate. Such arrangements must be clearly articulated in the CAME.
9. The scope of the Mil CAMO ►QMS◄ will cover all Maintenance activity on Air Systems that the Mil CAMO is responsible for, both on and off platform, including Contracted Depth Maintenance.
10. The term independence in respect of this RA refers to the need of those undertaking Quality activity to be independent from the task rather than from the Mil CAMO.
11. The MAA MAOS / CAMO Form 4 can be found on the MAA Website►4◄.

Regulation 4951(2)

Functions of the Quality ►Management◄ System

- 4951(2) The ►QMS◄ **shall** monitor all Mil CAMO activities. It **shall** include the following functions, as a minimum:
- a. Assurance of personnel Competence.
 - b. Assurance of all CAMO tasks, processes, orders and procedures.
 - c. Assurance of CAME compliance with Regulation.
 - d. Assurance of Alternative Acceptable Means of Compliance, Waivers and Exemption (AWE) submissions and subsequent AWE management.
 - e. Assurance of Maintenance activity conducted by Maintenance organizations is adequate for maintaining the Continuing Airworthiness of their Air Systems.

⁵ ►Refer to RA 1200 - Air Safety Management.◄

**Regulation
4951(2)**

- f. Assurance of all Contracted Maintenance carried out in accordance with (iaw) the Air System Document Set (ADS).
- g. Assurance of continued compliance with the requirements of MAA Approval of the Mil CAMO.
- h. Assurance of all Mil CAMO activities being performed iaw RA 4900 - 4974 (MRP Part M).

**Acceptable
Means of
Compliance
4951(2)**

Functions of the Quality ► Management ◀ System

- 12. The independent Quality Audit **should**:
 - a. Conduct Verification and Validation of all procedures and changes to the procedures within the CAME.
 - b. Use product sampling and sample checks.
 - c. Reach across applicable organizations, including Maintenance organization(s) (Forward and Depth (or Line and Base)), Delivery Team(s) (DT) and all Mil CAMO activity.
 - d. Ensure that all aspects of compliance are checked annually, including all the Subcontracted activities⁶. This may be carried out as a complete single exercise or subdivided over the annual period iaw a scheduled plan.
- 13. Where findings have been identified, the particular procedure **should** be rechecked until the findings have been rectified, after which the independent Audit procedure may revert back to the annual interval for that particular procedure. Provided that there are no Safety related findings, the Audit time periods specified may be increased by the Mil CAM but this **should not** exceed 100% (ie to a 2 year cycle).
- 14. Where the organization has more than one location approved, the ► QMS ◀ **should** describe how these are integrated into the system and include a plan to Audit each location every year.
- 15. A report **should** be raised each time an Audit is carried out describing what was checked and the resulting findings against applicable requirements, procedures and products.
- 16. The independence of the Audit **should** be established by always ensuring that Audits are carried out by personnel not involved with the function, procedure or products being checked.
- 17. An organization **should** establish a Quality plan to show when and how often the Mil CAMO activities will be Audited.
- 18. All non-conformities and non-compliances **should** be investigated and rectified using a Root Cause Analysis (RCA) approach, tool, or techniques⁷. Instructions for the use of RCA **should** be detailed in Part 2 of the CAME.

**Guidance
Material
4951(2)**

Functions of the Quality ► Management ◀ System

- 19. The independent Audit represents an objective overview of all Mil CAMO related activities. It is intended to complement the Military Airworthiness Review, to ensure that all Air Systems managed by the organization remain Airworthy. The independent Auditor cannot be directly involved with the task being Audited, though may be a part of the organization.
- 20. The independent Audit does not require each procedure to be checked against each Air System when it can be shown that the particular procedure is common to

⁶ Refer to RA 4956 – Military Continuing Airworthiness Management Organization Tasks Performed by Other Organizations - MRP Part M Subpart G.

⁷ Further information may be found in Civil Aviation Authority - CAP1760 – Effective Problem Solving and Root Cause Identification Stage 6, refers. Available at: [http://publicapps.caa.co.uk/docs/33/CAP1760 Root Cause Identification Paper \(Issue 02 April 19\).pdf](http://publicapps.caa.co.uk/docs/33/CAP1760%20Root%20Cause%20Identification%20Paper%20(Issue%2002%20April%2019).pdf).

**Guidance
Material
4951(2)**

more than one Air System and the procedure has been checked every year without resultant findings.

21. In regards to Contracted Maintenance it may not be necessary for the Mil CAMO QM to Audit the supply chain through multiple levels of Subcontractors. ►◄ The Mil CAMO QM ► **needs** ◄ to monitor the directly Contracted organization⁸ and receive Assurance that Subcontractors are being appropriately monitored if the Contracted organization's own ► **QMS** ◄ extends to cover their activity and the Mil CAM is able to monitor such Audit reports.

22. The Mil CAMO QM ► **needs** ◄ to be mindful of the arrangements for access to Contracted and Subcontracted organizations. Where access for the Mil CAMO is not clearly stipulated in the contract, the Mil CAMO QM ought to pursue the contracting DT to amend the contract accordingly. The Mil CAMO QM may utilize a wide range of sources to monitor such organizations; for example where a DT utilizes a Government Quality Assurance Organization Contract Monitoring Team to conduct Assurance of Contracted Maintenance, evidence from such activity may be acceptable for Assurance purposes. In the event of disputed access to a Contracted organization, the Government Quality Assurance Representative (GQAR) may undertake Assurance activity, or alternatively may apply for GQAR status; further information may be found on the Knowledge in Defence (KiD)⁹ website typing 'Managing Quality' in the search bar.

**Regulation
4951(3)**

Retention of Quality ► Management ◄ System Records

4951(3) The records of these activities **shall** be stored for at least two years.

**Acceptable
Means of
Compliance
4951(3)**

Retention of Quality ► Management ◄ System Records

23. Mil CAMO Quality System Records **should** be categorized as Continuing Airworthiness Records¹⁰ and retained for at least two years.

**Guidance
Material
4951(3)**

Retention of Quality ► Management ◄ System Records

24. RA 4964(2)¹⁰ provides additional details on record keeping requirements.

⁸ ► Refer to RA 1005 – Contracting with Competent Organizations. ◄

⁹ Refer to Knowledge in Defence at website - <https://www.gov.uk/guidance/knowledge-in-defence-kid>.

¹⁰ Refer to RA 4964(2): Continuing Airworthiness Records.

► This RA has been substantially re-written; for clarity no change marks are presented – please read RA in its entirety ◀

RA 4955 - Findings - MRP Part M Subpart G

Rationale

Following the Notification of an Assurance finding by the MAA on a Military Continuing Airworthiness Management Organization, it is essential that the Regulatory non-compliance or other non-conformance is appropriately addressed and actioned by the Military Continuing Airworthiness Manager (Mil CAM). If the findings are not acted upon by the Mil CAM, the Continuing Airworthiness of the Air System(s) may be compromised. This RA requires Root Cause Analysis (RCA) to be carried out on all findings, and observations (where applicable), to enable the identification and rectification of all issues, to reduce the likelihood of Reoccurrence.

Contents

4955(1): Findings

4955(2): Corrective Actions

4955(3): Observations

Regulation

4955(1)

Findings

4955(1) After receipt of notification of MAA findings the Mil CAM **shall** devise and execute a Corrective Action Plan (CAP) to demonstrate how the Finding and the Root Cause will be rectified to reduce the likelihood of Reoccurrence.

Acceptable Means of Compliance 4955(1)

Findings

1. All findings **should** be investigated and rectified using an RCA approach, tool, or technique¹. Instructions for the use of RCA **should** be detailed in Part 2 of the Continuing Airworthiness Management Exposition.
2. Issues or required work identified in an Aircraft Product Sample (APS) report², **should** be actioned to the satisfaction of the MAA within the period stipulated in the notification.
3. Where necessary the Mil CAM **should** take immediate containment actions to preserve Air Safety.
4. For MAA findings the CAP **should** be provided to the MAA in accordance with MAA03³ and include the RCA, corrective actions, preventative actions and the implementation plan.

Guidance Material

4955(1)

Findings

Findings

5. There are 2 types of MAA findings, non-compliance and non-conformance, each of which can lead to the MAA raising a Corrective Action Requirement (CAR). Findings are sub-divided into 2 levels as follows:
 - a. Non-compliance:
 - (1) Level 1: A failure to meet MRP Part M Regulation, that could lead to a major Risk to Air Safety.
 - (2) Level 2: A non-compliance that is judged not to be a Level 1.
 - b. Non-conformance:

¹ Guidance can be found in Civil Aviation Authority – [CAP 1760 Effective Problem Solving and Root Cause Identification Stage 6](#) or [JSP 940 MOD Policy for Quality; Part 2: Guidance](#) and training is available through [MAA Training Courses](#) as applicable.

² Details of issues and work required are found in the APS Report Annex A: MAA APS Summary of Areas Requiring Further Attention.

³ Refer to MAA 03: MAA Regulatory Processes: Annexe F: MAA Assurance.

**Guidance
Material
4955(1)**

(1) Level 1: A deviation from or an omission of a requirement that may contribute to a major Air Safety Risk.

(2) Level 2: A non-conformity that is judged not to be a Level 1.

6. Issues or required work identified in an APS report² may not be non-conformities or non-compliances that necessarily lower the Safety standard and possibly compromise Air Safety. The action taken by the Mil CAM against each Annex A serial needs to be proportionate following evaluation. An entry in the Air System Technical Log, receipt of Type Airworthiness Authority (TAA)⁴ technical advice or similar action, may be all that is required to close out an individual APS Report Annex A serial to the satisfaction of the MAA. Following evaluation, in some circumstances it will be necessary to conduct further investigation, RCA and develop a Corrective Action Plan.

Route Cause Analysis

7. RCA is meant to focus on why the finding occurred not the who or what was responsible. Establishing the root Cause(s) often requires an overarching view of the events and circumstances that led to it, to identify all the possible systemic and contributing factors (regulatory, technical, human, organizational, etc.) in addition to the direct factors.

8. A narrow focus on single events or failures, or the use of a simple, linear model, such as a Fault Tree Analysis, to identify the chain of events that led to the finding may not properly reflect the complexity of the issue, increasing the Risk that important factors to be addressed to prevent a reoccurrence will be missed. An inappropriate or partial RCA could lead to 'quick fixes' that only address the symptoms of the finding.

9. A peer review of the results of the RCA may increase its reliability and objectivity.

**Regulation
4955(2)**

Corrective Actions

4955(2) The actions in the CAP **shall** be implemented to the satisfaction of the MAA and within the agreed timescales³

**Acceptable
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Compliance
4955(2)**

Corrective Actions

10. After receipt and acceptance of the CAP has been confirmed by the MAA, the Mil CAM **should** implement the actions within the agreed period.

11. The Mil CAM **should** inform the MAA when the CAP has been completed and provide sufficient evidence to justify closure.

**Guidance
Material
4955(2)**

Corrective Actions

12. CAPs generated by the Mil CAM in response to issues identified in an APS report Annex A that are not non-compliances or non-conformances as per Guidance Material Paragraph 6 of this RA, do not need to be submitted to the MAA but must be retained as a record.

**Regulation
4955(3)**

Observations

4955(3) Any observations³ noted during MAA Audits **shall** be given due consideration by the Mil CAM, and any decisions taken in respect of those observations recorded.

⁴ Where the Air System is not UK MOD-owned, Type Airworthiness (TAW) management regulatory Responsibility by either the TAA or Type Airworthiness Manager (TAM) needs to be agreed within the Sponsor's approved model; refer to RA 1162 - Air Safety Governance Arrangements for Civilian Operated (Development) and (In-Service) Air Systems, or refer to RA 1163 - Air Safety Governance Arrangements for Special Case Flying Air Systems. Dependent on the agreed delegation of TAW Responsibilities TAM may be read in place of TAA as appropriate throughout this RA.

**Acceptable
Means of
Compliance
4955(3)****Observations**

13. For each negative observation notified by the MAA, the Mil CAM **should** analyse the related issues and determine when actions are needed.
14. The Mil CAM **should** record the analysis and the outputs, such as the actions taken or the reasons for not taking actions.

**Guidance
Material
4955(3)****Observations**

15. The handling of the observations may follow a process similar to the handling of findings by the Mil CAM.

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RA 4966 – Military Continuing Airworthiness Management Organization Instructions – MRP Part M Subpart C

Rationale

When a Continuing Airworthiness engineering requirement for Technical Information (TI) arises, local instructions may be developed to meet the immediate need. Where such a need is identified a Military Continuing Airworthiness Manager (Mil CAM) may raise a Military Continuing Airworthiness Management Organization (Mil CAMO) Instruction. If not rigorously controlled, these instructions may cause deviation from the Type Design or mask the demand for revision of TI leading to degradation in the Airworthiness of the Air System. This RA details the minimum requirements for raising a Mil CAMO Instruction to give authority to undertake a work package necessary to maintain the Continuing Airworthiness of the Air System.

Contents

4966(1): Use of Military Continuing Airworthiness Management Organization Instructions

4966(2): Management of Military Continuing Airworthiness Management Organization Instructions

Regulation 4966(1)

Use of Military Continuing Airworthiness Management Organization Instructions

4966(1) Local procedures developed to overcome the absence of appropriate TI **shall** be issued as Mil CAMO Instructions.

Acceptable Means of Compliance 4966(1)

Use of Military Continuing Airworthiness Management Organization Instructions

1. Mil CAMO Instructions **should** be approved by the Mil CAM prior to issue unless that approval has been delegated under the appropriate authority¹ to an individual meeting the Competency requirement of RA 4945(3)².
2. Mil CAMO Instructions **should not** be used to make or Approve changes to Type Design³, Repairs to an Air System or to make Configuration changes other than with Role Equipment. All Mil CAMO Instructions **should** be considered within the bounds of the Air System Safety Case (ASSC)^{4,5}.
3. Mil CAMO Instructions are TI⁶ and **should** satisfy a local Airworthiness, availability or capability concern.
4. Mil CAMO Instructions **should** only be issued for Air Systems within the issuing authority's Area of Responsibility.
5. Mil CAMO Instructions **should** be shared with other organizations, operating the same Air System, to inform their decision making.
6. Mil CAMO instructions **should not** be used to promulgate or supersede Type Airworthiness Instructions that **should** be issued by the Type Airworthiness Authority (TAA)^{7,8}.

¹ Refer to Manual of Airworthiness Maintenance – Processes (MAM-P), Chapter 0.6 – Authority Levels and Tasks, MAMP-K1030 – Authorize personnel to issue Mil CAMO Instructions, or civilian equivalent for those operating under the Contractor Flying Approved Organization Scheme arrangements.

² Refer to RA 4945(3): Personnel Competence and MRP Part M Authorization.

³ Refer to RA 5820 – Changes in Type Design (MRP Part 21 Subpart D).

⁴ Refer to RA 1205 – Air System Safety Cases.

⁵ Refer to RA 1020(1): Roles and Responsibilities of the Aviation Duty Holder.

⁶ Refer to RA 4810(2): Scope of Applicable Technical Information (MRP 145.A.45(b)).

⁷ Refer to RA 5405 – Special Instruction (Technical).

⁸ Where the Air System is not UK MOD-owned, Type Airworthiness (TAw) management regulatory Responsibility by either the TAA or Type Airworthiness Manager (TAM) needs to be agreed within the Sponsor's approved model; refer to RA 1162 – Air Safety Governance Arrangements for Civilian Operated (Development) and (In-Service) Air Systems, or refer to RA 1163 – Air Safety Governance Arrangements for Special Case Flying Air Systems. Dependent on the agreed delegation of TAw Responsibilities TAM may be read in place of TAA as appropriate throughout this RA.

**Acceptable
Means of
Compliance
4966(1)**

7. Where an organization operates under Leaflet B40⁹, the Mil CAM **should** instruct the civil CAM to release the CAMO Instruction or civil equivalent^{10,11}.

Responsibilities

8. Prior to issuing a Mil CAMO Instruction, the Mil CAM **should** assess whether it **► generates additional Risk to the Airworthiness of the affected Air System, or affects the Equipment Safety Assessment, and ensure all reasonable efforts are made by the Mil CAMO to engage the TAA or Commodity Delivery Team Leader (DTL) for support and procedural Validation, ◀ and if required, consult with the ► Delivery Duty Holder (DDH) or Accountable Manager (Military Flying) (AM(MF)) ◀ on the effect on the ASSC⁴.**

9. Where TI affects the ASSC, the mechanism for management **should** be included within the Air Safety Management System^{5,12}.

10. The Mil CAM **should** ensure that any impact on availability and operational capability is understood.

11. The Mil CAM **should** ensure that **► the Mil CAMO Instruction is cancelled once the updated TI is promulgated, drawings amended, or the requirement is satisfied. ◀**

a. ► ◀

b. ► ◀

**Guidance
Material
4966(1)**

Use of Military Continuing Airworthiness Management Organization Instructions

General

12. Mil CAMO Instructions are intended to provide a controlled means to introduce procedural instructions¹³ as a temporary solution when appropriate TI does not exist or where there is a need for TI to be released as a Special Instruction (Technical) (SI(T))⁷ that cannot be provided in the required timescale. The issue of a Mil CAMO Instruction does not replace the requirement to report Air Safety Occurrences¹⁴ or to request amendment to TI¹⁵.

13. The use of a Mil CAMO Instruction to address an engineering requirement instead of waiting for the generation of TI may carry some additional Risk to the Airworthiness of the affected Air System(s). Control measures are therefore required to ensure that Mil CAMO Instructions are used only within strict boundaries and to manage any additional Risk correctly.

14. Mil CAMO Instructions may be used for but not limited to:

- a. A scoping mechanism to determine the extent of a technical issue or to disseminate information of a technical administrative or policy nature¹⁶.
- b. Local processes outside of Aviation Engineering Standing Orders / Aviation Engineering Routine Orders.
- c. Maintenance Organization guidance and instruction.
- d. Clarification of TI pending formal amendment.
- e. Requesting any Continuing Airworthiness activities and actions from a Maintenance Organization.

15. The proposed means of closure will be included in the 'follow-up' paragraph of the Mil CAMO Instruction.

⁹ Refer to RA 1165 – ►UK◀ Civil Aviation Authority Oversight of ►UK◀ Military Registered ►Aircraft.◀

¹⁰ Ensuring the instruction stays within the bounds of Leaflet B-40.

¹¹ Unless managed under the requirements of Leaflet B-40, using the Exception process.

¹² Refer to RA 1200 – Air Safety Management.

¹³ This includes formalising an inspection or check for local management purposes.

¹⁴ Refer to RA 1410 – Occurrence Reporting and Management.

¹⁵ Refer to RA 4810(3): Requirement to Inform Technical Information Author of Errors (MRP 145.A.45(c)) ►◀.

¹⁶ The SI(T) generic template is available on the MAA websites and is appropriate.

**Guidance
Material
4966(1)**

16. A Mil CAMO Instruction remains extant until the Mil CAM withdraws or amends it.

Layout

17. The Mil CAMO Instruction is permissive by nature and there is no prescribed template. However, the following ►need to◄ be considered:

- a. Title.
- b. Application.
- c. Reason.
- d. Compliance timelines.
- e. Safety precautions.
- f. Action required.
- g. Recording.
- h. Reporting.
- i. Follow up – including a route to closure.
- j. Additional Requirements.
- k. Authorization.

**Regulation
4966(2)**

Management of Military Continuing Airworthiness Management Organization Instructions

4966(2) Mil CAMs **shall** ensure that suitable procedures are in place to control Mil CAMO Instructions.

**Acceptable
Means of
Compliance
4966(2)**

Management of Military Continuing Airworthiness Management Organization Instructions

18. The Mil CAM **should** have procedures to:

- a. Set the boundaries within which Mil CAMO Instructions are permitted.
- b. Specify the requirements for consultation of the following personnel, or their nominated representatives, regarding the content of a Mil CAMO Instruction:
 - (1) The DDH ►or AM(MF).◄
 - (2) The DDH Senior Operator ►or AM(MF)'s nominated Flight Operations post holder.◄
 - (3) The DDH Chief Air Engineer.
 - (4) The TAA, ►TAM◄ or Commodity DTL.
 - (5) Civil CAM (for those operating under Leaflet B-40).
- c. Control the validity of Mil CAMO Instructions, by:
 - (1) Maintaining a register of all Mil CAMO Instructions including an accurate distribution list to ensure they can actively manage compliance, retaining an Audit trail of all actions relating to the Instruction.
 - (2) Limiting the length of time for which a Mil CAMO Instruction is valid after initial issue, setting a maximum cumulative period of validity and specifying who may extend the validity following the initial issue period.
 - (3) Ensuring appropriate follow up action is initiated as required, to ensure the Mil CAMO Instruction remains extant for the minimum required period; issuing clear instructions when they are superseded, time expired, fully completed, or otherwise cancelled.

**Guidance
Material
4966(2)**

**Management of Military Continuing Airworthiness Management
Organization Instructions**

19. The Mil CAM's system to monitor and proactively manage Mil CAMO Instructions directs that these remain extant for the minimum practical period. Extensions to Mil CAMO Instructions undermine this principle and careful consideration is key prior to any extension being approved.

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