



Government of India
DIRECTORATE GENERAL OF CIVIL AVIATION

AAC No. 4 of 2024
Revision 1
Dated July 2026

AIRWORTHINESS ADVISORY CIRCULAR

F. No. DGCA-25011(02)/95/2024-AW

Subject: Transition to New regulations (CAR-CAMO, CAR-CAO)

DGCA has issued new regulations (CAR-CAO and CAR-CAMO) and amended existing regulations CAR-145 & CAR-M in the continuing airworthiness domain on 31.7.2024. These regulations introduce new types of organisations (CAR-CAO and CAR-CAMO). This AAC provides guidelines on the transition of existing continuing airworthiness organisations to the new CAR-CAO and CAR-CAMO organization.

I. Introduction

a. General

CAR-CAO (Issue I dated 31.7.2024), CAR-CAMO (Issue I dated 31.7.2024) and CAR-ML (Issue I dated 31.7.2024), CAR-145 (Issue III) & CAR-M (Issue III) will become effective from 01-01-2025. Thereby, the structure of the existing regulation is modified as shown below:

Designation	Topic
CAR-M	Continuing airworthiness requirements – other-than-'light aircraft' and aircraft used by Air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937
	Includes Subpart F and Subpart G organisation requirements, applicable only until 31st July -2026
CAR-145	Maintenance organisation (all types of aircraft types and operation)
CAR-ML	Continuing airworthiness requirements – 'light aircraft' not used by Air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937
CAR-CAMO	Continuing airworthiness management organisation (all types of aircraft types and operation)
CAR-CAO	Combined (continuing airworthiness management and/or maintenance) organisation – non-complex aircraft and operators other than Air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937

Note: the denomination 'Light aircraft' means the following non-complex motor-powered aircraft:

- aeroplanes up to 2730 Kg MTOM
- rotorcraft up to 1200 Kg MTOM / max 4 occupants
- other LA2 aircraft.

Important:

CAR-ML is the only option for 'light aircraft' not used by Air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937. All other aircraft must follow CAR-M standard¹.

It is not allowed to 'voluntary' apply CAR-M on 'light aircraft' not used by Air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937.

As a consequence, from 31st July 2026, each aircraft must follow either CAR-M or CAR-ML standard, and any person or organisation involved in continuing airworthiness must comply with CAR-M, or CAR-ML or both, depending on the scope of activities (related type(s) of aircraft and operation(s)).

Regulation does not introduce a 'CAR-ML organisation' because CAR-ML is only a standard for 'light aircraft'. However, all types of organisations (CAR-CAMO, CAR-CAO, CAR-145) may be involved in continuing airworthiness activities for aircraft following CAR-ML.

The new organisations introduced are CAR-CAO organisations and CAR-CAMO organisations.

- **CAR-CAMO** provides requirements for Continuing Airworthiness Management Organisation (CAMO): compared with CAR-M Subpart G organisation, the main difference is the introduction of SMS principles.
- **CAR-CAO** provides a new set of requirements for Combined Airworthiness Organisation: such organisation may perform CAMO activities or Maintenance Organisation activities, or both, but limited to non-complex aircraft not used by an air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937.

These **CAR-CAMO** and **CAR-CAO** organisations are supposed to gradually replace CAR-M Subpart F and CAR-M Subpart G organisations. **After 31st July 2026, there should be no more CAR-M Subpart F and CAR-M Subpart G organisations.** This is the reason why, to be able to continue their activities, the existing CAR-M Subpart F and CAR-M Subpart G organisations must eventually receive a new approval.

¹ Subparts F and G are excluded from this statement because they are organisation requirements as opposed to technical standard.

b. Transition

To facilitate the issue of new approval for existing organisation, this AAC provides the guidelines for organisations with a valid CAR-M Subpart F, CAR-M Subpart G and CAR-145 approval to make a transition to CAR-CAO or CAR-CAMO, instead of following the complete process of an initial approval to CAR-CAO or CAR-CAMO.

Depending on the current approval and scope held, the existing organisation may choose one of the below transition paths:

Existing approval		New approval using transition (same scope)		
Approval type	Scope	Approval type		Initial Privileges
CAR-M Subpart G	complex motor-powered aircraft (CMPA) and/or aircraft used by air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937	CAR-CAMO		Same
CAR-M Subpart G	non-CMPA not used by air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937	Or	CAR-CAO	Same
			CAR-CAMO	Same
CAR-M Subpart G	All types of aircraft and operation	CAR-CAMO		Same
CAR-M Subpart F	non-CMPA not used by air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937	CAR-CAO		maintenance only
		No transition facilitation to CAR-145 (initial approval required)		Not applicable
CAR-145	non-CMPA not used by air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937	Or	CAR-CAO	maintenance only
			keep CAR-145 (no transition)	Not applicable
CAR-145	All types of aircraft and operation	Transition to CAR-CAO not possible for that scope of work: keep CAR-145		Not applicable

If existing approved organization, do not transition to CAR-CAO or CAMO:

- CAR-145 organisation may continue their activities with the CAR-145 approval;
- CAR-M Subpart F organisation may continue their activities with the CAR-M Subpart F approval **only till 31st July 2026**;

- CAR-M Subpart G organisation may continue their activities with the CAR-M Subpart G approval **only till 31st July 2026**.

Note: If an organisation holds both continuing airworthiness and maintenance approvals, this organisation can make a single request to DGCA to transition both approvals to a single CAO (to the extent that both existing approvals satisfy the above transition paths).

The request from organisation to apply for such transition to CAR-CAO and CAR-CAMO should be made to DGCA on eGCA platform in a form and manner established. The transition period ends on 31st July 2026, so the request should be made sufficiently in advance of this date (no later than 31.12.2025) to allow for completion of the transition process in due time.

If an organisation wishes to transition only one part of its activities to CAR-CAO (e.g. non-CMPA scope of work of CAR-145), this case will be treated as a new approval and not as a transition. This is because, in order to follow the transition process, an existing approved exposition or manual is required as a basis for that particular activity.

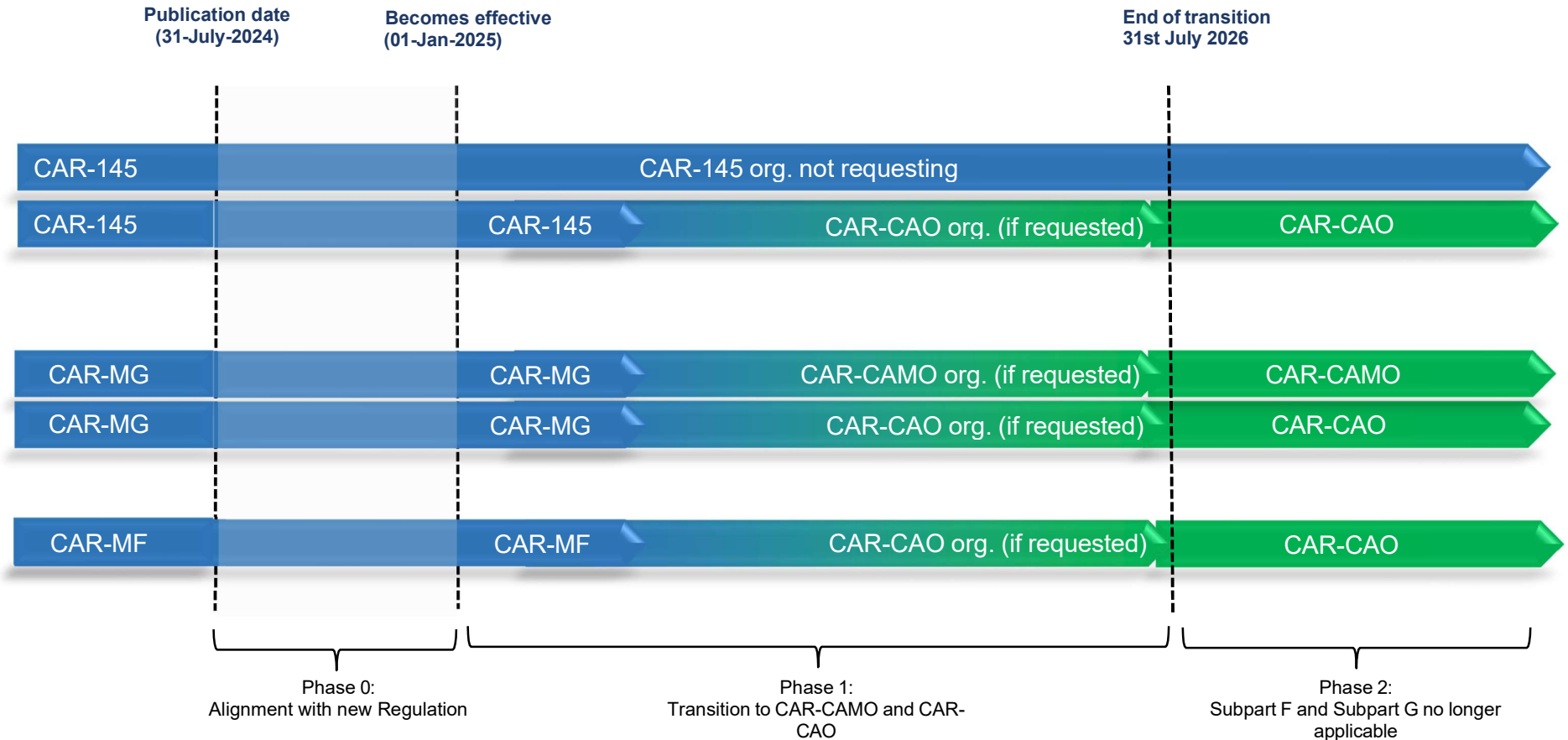
Convention:

In the rest of the document:

- 'CAR-MG' and 'CAR-MF' will designate respectively 'CAR-M Subpart F' and 'CAR-M Subpart G'
- 'CAR-CA(M)O' will designate 'CAR-CAO or CAR-CAMO'

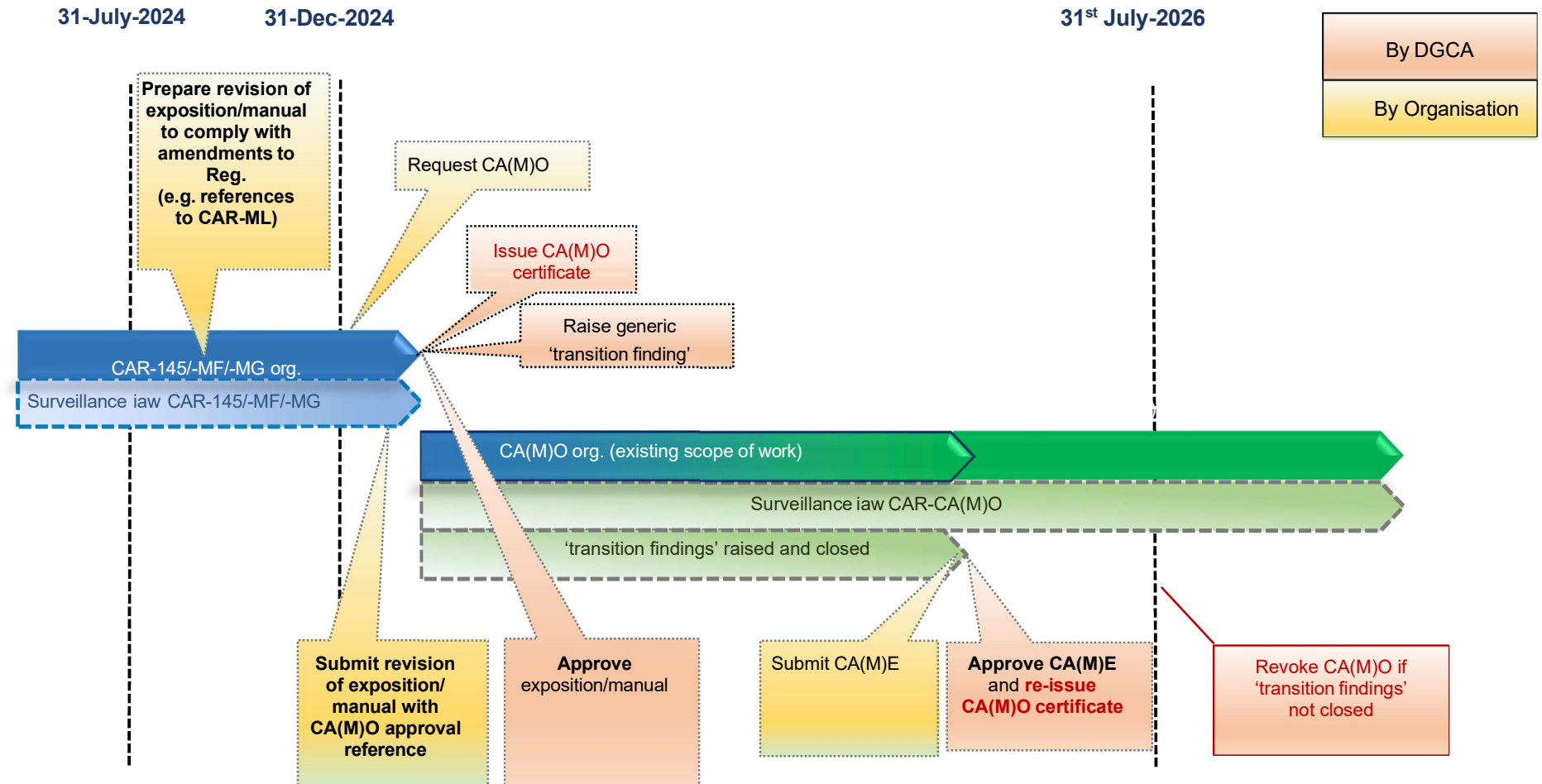
II. Overview of the transition to CAR-CA(M)O

The following figure provides an overview of the expected transition process and chronology:



Note: Initial approvals to CAR-MF and CAR-MG may still be issued until 31-Dec-2024.

The following figure provides an overview of the step approach developed in the next chapter.



Note: request for CAR-CA(M)O is required to be submitted online on EGCA platform from 01-01-2025.

III. Steps for transition to CAR-CA(M)O

The following propose a 10-steps approach for the transition of CAR-145/-MF/-MG organisation to CAR-CAO or CAR-CAMO

Overview:

Phase	Step	Description
0	0	Compliance with new Regulation
1	1	Eligibility to CAR-CA(M)O
	2	Request for CAR-CA(M)O approval
	3	Exposition/manual amendment
	4a	Initial CA(M)O approval
	4b	Finding notifications
	5	Implementation plan
	6	Acceptance of the plan and oversight programme adjustment
	7	Oversight during transition
	8	Implementation plan execution
	9	Final CA(M)O approval
2	10	End of transition and changes to organisation

Convention: in the following table, the term “exposition/manual” designates the type of document used by the organisation demonstrating compliance with CAR-MF/-MG/- 145 at the time when the organisation requests a transition to CAR-CA(M)O, while the term “CA(M)E” designates the organisation exposition demonstrating compliance to CAR-CA(M)O at the end of the transition process. After approval of the “CA(M)E”, the approval of the “exposition/manual” is no longer valid.

Step	Action	Remark
0	Compliance with Regulation CAR-145, CAR-MF and CAR-MG organisations will need to prepare the necessary amendments to the exposition/manual to be in compliance with CAR-145 Issue 3, CAR-MF Issue 3 and CAR-MG Issue 3.	This means that CAR-145, CAR-MF and CAR-MG organisations, if working on CAR-ML aircraft, have introduced reference to (or amendments in compliance with) CAR-ML. Appendix I provides a list of some of the main changes introduced.
1	Eligibility to CAR-CA(M)O The organisation reviews the eligibility for their organisation to transition to CAR-CA(M)O, analysing existing (and future desired, where applicable) scope of work.	Note: CAR-CAO is applicable under the following conditions: a. The aircraft is not used by an air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937; b. The aircraft is a not a complex motor-powered aircraft
2	Request for CAR-CA(M)O approval The approved organisation requests a CAR-CA(M)O approval to DGCA by applying through EGCA. Note: the organisation may already accompany this request with a draft of the 'implementation plan' which will be asked to the organisation at step 4b. DGCA verifies the eligibility of the organisation, and if the organisation is eligible, informs the organisation of the future CA(M)O approval number/reference ([IND].CAR-CAO.[XXXX] or [IND].CAR-CAMO.[XXXX]).	After 01-01-2025 and before 31st July 2026 Note: All existing organisations desirous of obtaining CAR-CAMO or CAR-CAO approvals shall submit application to DGCA no later than 31.12.2025.

Step	Action	Remark
3	Exposition/manual amendment The organisation submit the amendment to the existing exposition/manual to DGCA for approval. This amendment introduces: - the changes necessary to comply with CAR-145 Issue 3/ CAR-MF Issue 3/ CAR-MG Issue 3 as required. (see step 0) - the approval number/reference ([IND].CAR-CAO.[XXXX] or [IND].CAR-CAMO.[XXXX]) provided by DGCA (step 2). This reference is to be introduced, in particular, into DGCA Form 1 and DGCA Form 15 organisation templates. Once approved, the organisation uses this amended exposition/manual until the re-issue of the CAR-CA(M)O certificate and the approval of the CA(M)E (step 9).	—
4a	Initial CA(M)O approval a. The DGCA issues 'Form 3-CAO' or 'Form 14-CAMO' certificate with the approval number/reference. This certificate must reflect the same privileges as the ones held by the organisation under CAR-145/-MF/-MG and not exceed the CAR-CA(M)O defined privileges (Refer to the table in section I(b) of this AAC); b. After verification the DGCA approves the amended exposition/manual; NOTE: DGCA may make certain verifications (e.g. privileges, scope of work, update of organisations forms, consideration of Part-ML if applicable), but it is not the intent to verify compliance to CAR-CA(M)O at this stage. The intent is to “grandfather” the existing organisation as a CAR-CA(M)O organisation. c. The organisation surrender the existing CAR-MF/-MG or CAR-145 certificate to the DGCA.	After 01-01-2025 and before 31st July 2026 Initial DGCA Form 3-CAO (for CAR-CAO) or DGCA Form 14 (for CAR-CAMO) certificates should include, on page 2, the reference to the amended exposition/manual. In case an organisation holds both CAR-MF and MG approvals and request a CAR-CAO covering both activities, references to both expositions/manuals (if they are separated) should be mentioned on page 2. DGCA is not required to issue the Approval Recommendation Report at this step.

Step	Action	Remark
4b	Finding notifications The DGCA also: d. notifies to the applicant a 'generic transition finding' e. transfer the open findings raised against CAR-MF/-MG or CAR-145 into 'oversight findings' against the relevant equivalent CAR-CA(M)O requirements with no change in agreed closure dates. Remark: if no equivalent requirement exists in CAR-CA(M)O, the finding will be closed without further showing.	Proposed wording for the 'Generic transition finding' (Level 2): <i>"On the basis of CAR-145 Issue 3/ CAR-MF Issue 3/ CAR-MG Issue 3, approval reference [IND].CAR-CAMO.[XXXX]/ [IND].CAR-CAO.[XXXX] is issued to [Company name], but the organisation has not demonstrated that it complies with all requirements of CAR-CAMO or CAR-CAO.</i> <i>The organisation shall take necessary measures to demonstrate to the satisfaction of DGCA that, before 30.6.2026, it complies with the applicable requirements newly introduced by CAR-CA(M)O and not included in CAR-145 Issue 3/ CAR-MF Issue 3/ CAR-MG Issue 3. To this end, the organisation should establish and submit to DGCA an implementation plan.</i> <i>In the meantime, the organisation shall continue working with the existing procedures as per the approved exposition/manual amended to account for the new approval reference and amendments to CAR-145 Issue 3/ CAR-MF Issue 3/ CAR-MG Issue 3."</i> For the re-notification of existing findings, DGCA may use the correspondence tables provided in appendices.
5	Implementation plan As a response to the 'generic transition finding', the organisation develops and submits an implementation plan that includes the following: • Gap analysis between the existing organisation procedures and the new CAR-CA(M)O requirements. • A roadmap for developing the CA(M)E (compliant with CAR-CA(M)O) • Training of staff on CAR-CA(M)O and training on the future CA(M)E	For the gap analysis, please refer to the correspondence tables between CAR-145 Issue 3/ CAR-MF Issue 3/ CAR-MG Issue 3 and CAR-CAMO/-CAO provided in appendices. Note: The CAE should not be considered to be a revision of the existing exposition/manual but a new document.

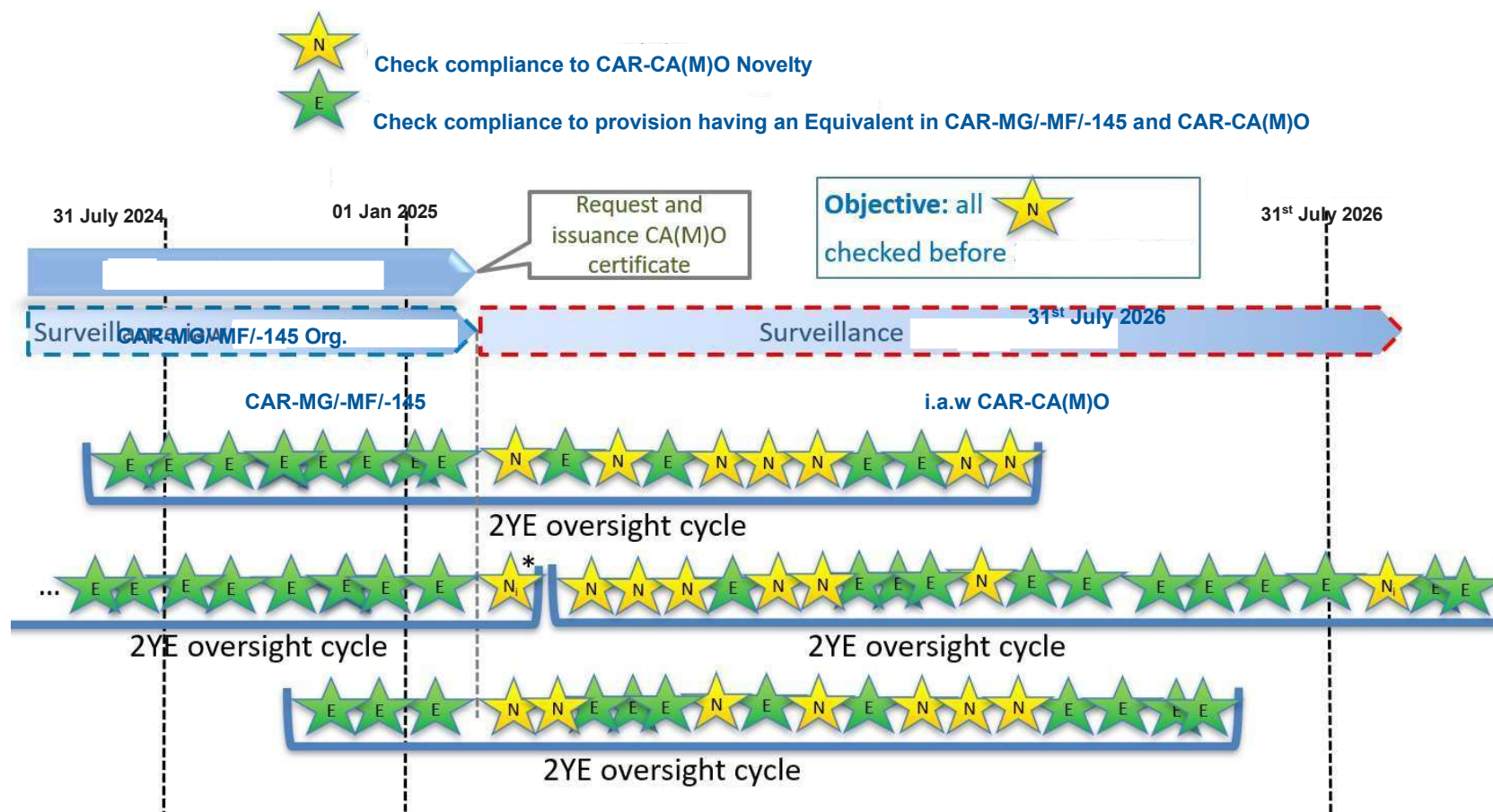
Step	Action	Remark
6	Acceptance of the implementation plan and oversight programme adjustment DGCA assesses the implementation plan proposed by the organisation, and if the assessment concludes that it is sufficient to address the transition, <u>accepts this plan</u>. DGCA also reviews the existing oversight programme, considering the following: - For requirements which are not new in CAR-CA(M)O (i.e. for which there is an equivalent in CAR-145 Issue 3/ CAR-MF Issue 3/ CAR-MG Issue 3), DGCA may take credit from oversight activities (audits, inspections, etc.) already performed as part of the ongoing oversight cycle to declare compliance of the organisation with the concerned CAR-CA(M)O requirements. - The current Annual Surveillance Programme (ASP) cycle may be continued, but the oversight programme should be reviewed to ensure that, before 30 June 2026, DGCA will have checked compliance of the organisation against the CAR-CA(M)O novelties (i.e. requirement which are newly introduced in CAR-CA(M)O and for which there is no equivalent in CAR-145 Issue 3/ CAR-MF Issue 3/ CAR-MG Issue 3) (see chapter IV).	Please refer to the correspondence tables between CAR-145 Issue 3/ CAR-MF Issue 3/ CAR-MG Issue 3 and CAR-CAMO/-CAO provided in appendices.
7	Oversight during transition DGCA continues to perform the oversight of the organisation, in accordance with: - CAR-CA(M)O; - the implementation plan; - the amended exposition/manual.	For the oversight activities during the transition period, 2 types of findings may be raised: Transition finding: Finding raised against requirements which are newly introduced in CAR-CA(M)O (novelties). Closure date for these transition findings shall not exceed 31st July 2026. This include the 'generic' transition finding. Oversight finding: Finding raised against CAR-CA(M)O requirements for which an equivalent requirement already exists in CAR-145 Issue 3/ CAR-MF Issue 3/ CAR-MG Issue 3. Oversight findings should be managed in accordance with Airworthiness Procedures Manual (APM). Please refer to the correspondence tables between CAR-145 Issue 3/ CAR-MF Issue 3/ CAR-MG Issue 3 and CAR-CAMO/-CAO provided in appendices. Column 3 offers a recommended policy for the finding classification (transition vs oversight findings). This column also includes a summary of the novelties where relevant.

Step	Action	Remark
8	Implementation plan execution Organisation execute the implementation plan, including the acquisition of the necessary resource and the development of the CA(M)E. It should be ensured that the staff receives difference training on the future approved CA(M)E and associated procedures. The drafting of the CA(M)E should take into account the transition findings raised by DGCA during the oversight. But it should be avoided to submit successive exposition amendments for approval with the aim to close these transition findings individually. Once the CA(M)E is considered fully compliant with CAR-CA(M)O, it shall be submitted to DGCA for approval.	DGCA review the implementation by desktop activities and onsite audit as specified in the oversight programme reviewed at step 6. Note: The CAE should not be considered to be a revision of the existing manual/exposition but a new document. To help in the CAE development, appendixes VI, VII and VIII offer cross-references between the CAE and respectively the MOE, MOM and CAR-MG Issue 3 CAME. To help in the CAME development, appendixes IX highlights the difference with the CAR-MG exposition.
9	Final CA(M)O approval At this stage, the DGCA should have: - checked compliance of the organisation against every CAR-CA(M)O novelties - checked that every 'transition finding' raised during oversight has been closed; - implementation plan has been completed. DGCA issues an approval recommendation report (refer to Form 13-CAMO or Form 613), and approves the CA(M)E, issue a revision of the 'CA Form 3-CAO' or 'CA Form 14' certificate and closes the 'generic transition finding'. On the certificate, the mention introduced on page 2 (step 4a) should be removed and the reference to the approved CA(M)E should be introduced.	Before 31st July 2026 Note: at this stage, an 'oversight finding' may remain open, within the limit of APM.

Step	Action	Remark
10	End of transition and changes to organisation At this stage, the organisation becomes a full compliant CAR-CA(M)O organisation and therefore this AAC, and in its appendices, are no longer applicable. The organisation may apply for a change to extend the privileges introduced at step 4a as foreseen by CAR-CA(M)O. After 31st July 2026: • CAR-MF/-MG organisations which have initiated, but not completed the transition to CAR-CA(M)O shall be revoked, limited or suspended, in whole or in part; • CAR-MF/-MG organisations which have not applied to a CAR-CA(M)O shall be revoked.	Changes must follow CAR-CA(M)O requirements and the approved CA(M)E.

IV. Overview of DGCA Oversight during transition

The following figure provides an overview of the content of the DGCA oversight programme during the transition (in accordance with the steps 4b, 6 and 7 of preceding chapter).

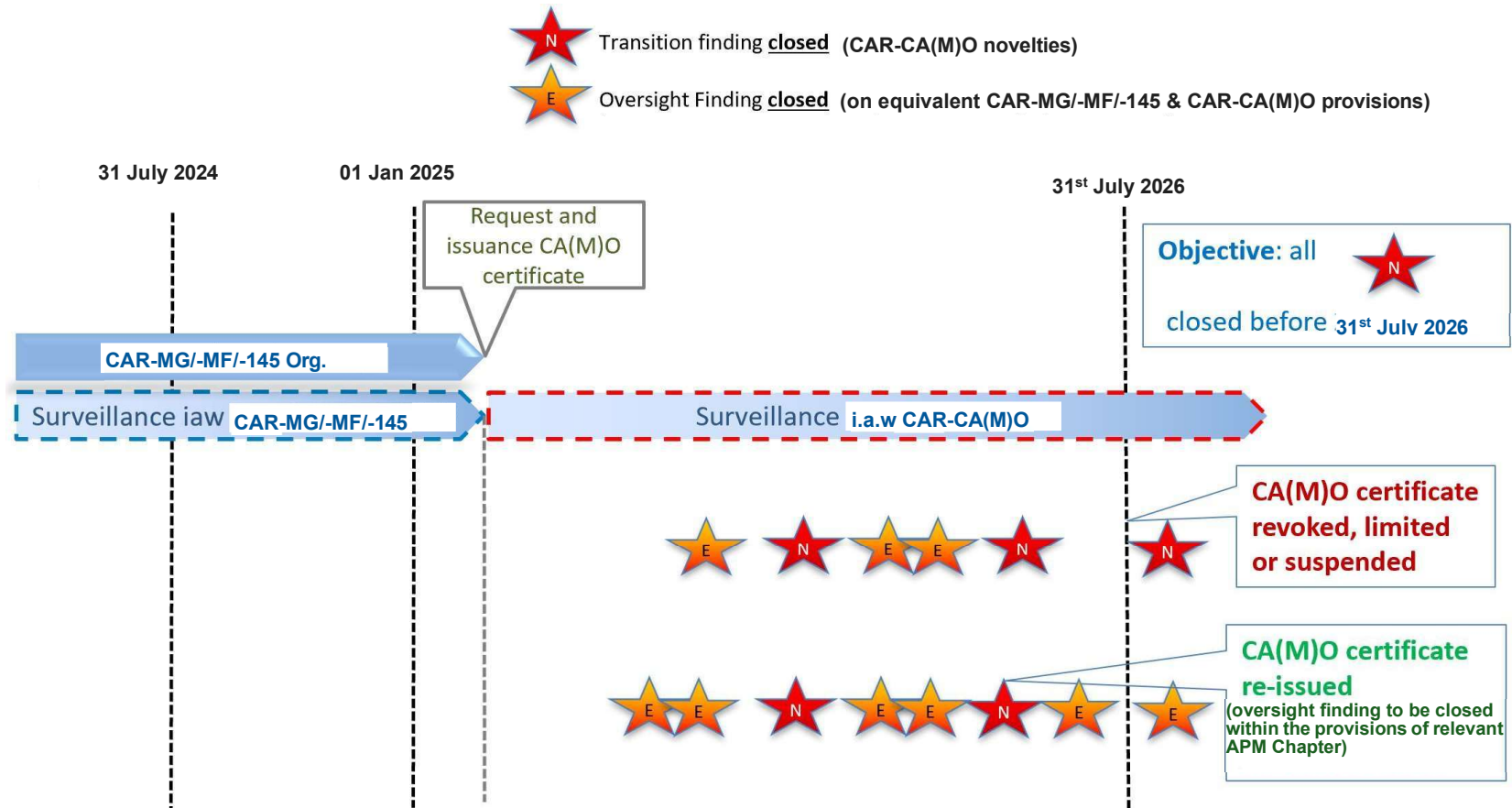


*: recommendation report at the end of this cycle will mark:

- the particular novelty 'Ni' as applicable and reviewed;
- the novelties other than Ni as applicable but not reviewed ('N/R').

This particular Ni novelty is part of the subsequent 2 YE oversight cycle, but it may be rechecked after 31st July 2026.

The following figure provides an overview of the management and outcomes of findings:



V. Changes to the CAR-MF, CAR-MG or CAR-145 organisation

Independently of the transition to CA(M)O, certain change may need to be introduced in the organisation during the transition. The following constitutes the guidance for the management of the requests for change to the organisation during the transition period (e.g. change of nominated person).

- Request for change submitted by the organisation before Step 4 need to be managed as agreed with the DGCA.
- Request for change submitted by the organisation between Step 4 and Step 9 need to follow the organisation's change procedure (as specified in the exposition/manual) valid at time of request. In particular:
 - new privilege provided for in CAR-CAO (e.g. maintenance for a subpart G organisation) cannot be granted by DGCA at this stage (see note below).
 - If the change is affected by a CAR-CA(M)O novelty without introducing a new CAR-CAO privilege, it may be approved by DGCA if it complies with the current exposition/manual and associated procedures, but a 'transition finding' should be raised if it does not comply with the CAR-CA(M)O novelty.
 - The existing organisation exposition/manual should be amended to introduce this change upon its approvals.
- A change approved and introduced in the existing organisation exposition/manual **between Step 4 and Step 9** should normally be reflected in the CA(M)E under development.
- Request for changes submitted by the organisation after Step 9, need to follow CAR-CA(M)O requirements and the approved CA(M)E.

Note 1: the above guidance relates to changes to the original organisation, necessary to ensure the continuity of the business; this does not prevent that, as part of the transition activities (and implementation plan) to CAR-CA(M)O, the organisation seeks a CAR-CA(M)O terms of approval at Step 9 going beyond the original scope of approval (e.g. maintenance for a CAR-MG organisation transitioning to CAR-CAO). The implementation plan should in this case be clear about such intention and DGCA should include the additional relevant elements in their oversight programme. The provisions which relate to the new intended scope of approval should be treated as novelties by DGCA and subject to 'transition findings'.

Note 2: In case the organization seeks approval beyond the existing scope of approval, applicable fees as per Rule 133C/ Rule 155A of the Aircraft Rules, 1937 shall be charged.

Sd/-
(Maneesh Kumar)
Joint Director General
for Director General of Civil Aviation

VI. Appendices

Appendix I — Compliance with new Regulations (CAR-CAMO, CAR-CAO, CAR-ML, CAR-M Issue 3, & CAR 145 Issue 3)

Before 31 December 2024, organisations holding a valid CAR-MG, CAR-MF or CAR-145 approval certificate should amend their exposition/manual and associated procedures, where applicable to account for changes introduced by new Regulations (CAR-CAMO, CAR-CAO, CAR-ML, CAR-M Issue 3, & CAR 145 Issue 3)

For that purpose, below is a non-exhaustive list of some of the main changes:

Airworthiness Review

- DGCA Forms 15a/b/c are updated. DGCA Forms 15 have to be used as follows:
 - DGCA Form 15a: to be issued by DGCA for aircraft following CAR-M regime.
 - DGCA Form 15b: to be issued by CAR-CAMO (or CAR-MG during transition period) for aircraft following CAR-M regime. (In case of organisations holding the AR privilege)
 - DGCA Form 15c: to be issued by DGCA for aircraft following CAR-ML regime.

Note: existing Airworthiness Review Certificates (ARC) issued before 31st July 2026 continue to be valid after 31st July 2026.

- After 31st July 2026, Airworthiness reviews for light aircraft not used by Air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937 shall be performed in accordance with Subpart I of CAR-ML.
- DGCA Form 15c becomes extendable and corresponding extension have to be carried out in accordance with ML.A.901.

Continuing Airworthiness of aircraft following CAR-ML

- AMP of CAR-ML aircraft shall be developed iaw ML.A.302.

Note: existing AMPs approved in compliance with M.A.302 before 31 December 2024 continue to be valid till **31st July** 2026.

- Defect management shall be performed according to ML.A.403.

Appendix II — CAR-CAMO vs CAR-MG Correspondence table and transition oversight policy

Potential transition findings are identified in blue background		
CAR-M subpart G requirement, where applicable	CAR-CAMO requirement	Oversight policy to be applied to grandfathered CAR-CAMO from 01 January 2025 to 31st July 2026
M.A.702 - Application	CAMO.A.115 – Application for an organisation certificate	In case of non-compliance with CAMO.A.115(a)/(b)(2), an oversight finding should be raised. CAMO.A.115(b)(1) is a new requirement for the organisation to provide the results of a pre-audit against the applicable requirements together with its application. When the organisation is grandfathered to CAR-CAMO, provision of the result of that pre-audit is not mandatory at the time the CAR-CAMO certificate is issued. If not already in place, the organisation should provide the DGCA with a procedure describing how changes not requiring prior approval will be managed and notified to the DGCA before 31st July 2026 (refer to CAMO.A.130).
M.A.703 – Extend of approval	CAMO.A.125(a)/(b)/(c) – Terms of approval and privileges of the organisation	In case of non-compliance with CAMO.A.125(a)/(b)/(c), an oversight finding should be raised. CAMO.A.125 covers both M.A.703 and M.A.711 requirements (refer to the line dedicated to M.A.711), M.A.711 'Privileges of the organisation' is incorporated (new points (d) to (f)) and relevant references updated. Only minor changes are made to the text stemming from M.A.711 to update the cross references and replace 'quality system' with 'management system'. The text is further amended to include the CAR-M/CAR-ML references for the extension of the ARC (cf. point (d)(4)) and for the issue of a recommendation for the airworthiness review by the DGCA (cf. point (e)(2)).
M.A.711 – Privileges of the organisation	CAMO.A.125(d)/(e)/(f) – Terms of approval and privileges of the organisation	In case of non-compliance with CAMO.A.125(d)/(e)/(f), an oversight finding should be raised.
M.A.713 – Changes to the approved continuing airworthiness organisation	CAMO.A.130 – Changes to the organisation	Potential transition finding: "Due to on-going transition from CAR-M subpart G to CAR-CAMO, current exposition does not contain necessary provisions to address CAMO.A.130 requirements". CAMO.A.130 introduces the term 'changes not requiring prior approval' replacing the 'indirect approval'. Changes not requiring prior approval will be managed as agreed between the organisation and the authority. The organisation should amend current exposition to account for CAMO.A.130 before 31st July 2026. Until the organisation is fully compliant with CAR-CAMO changes to the organisation should be managed i.a.w. the organisation current approved procedure. As a result, in case of non-compliance with M.A.713 and/or with the current procedure in place within the organisation, an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.715 – Continued validity of approval	CAMO.A.135 – Continued validity	Changes are made to update references and for consistency throughout the new CAR-CAMO. In case of non-compliance with CAMO.A.135, an oversight finding should be raised and managed i.a.w. relevant APM.
N/A – New requirement introduced by CAR-CAMO	CAMO.A.140 - Access	A new CAMO.A.140 Access is added. It contains the requirements for granting access to DGCA for the purpose of determining continued compliance. In case of non-compliance with CAMO.A.140, an oversight finding should be raised and managed i.a.w. relevant APM as this requirement was already existing in point (a)(2) of M.A.715 and is therefore not considered as a novelty.

Potential transition findings are identified in blue		
CAR-M subpart G requirement where applicable	CAR-CAMO requirement	Oversight policy to be applied to grandfathered CAR-CAMO from 01 January 2025 to 31st July 2026
M.A.716 - Findings	CAMO.A.150 – Findings	Potential transition finding: "Due to on-going transition from CAR-M subpart G to CAR-CAMO, current exposition procedure is not compliant with CAMO.A.150(a)(1)". CAMO.A.150 add a requirement to identify the root causes of and contributing factors to the non-compliance. The organisation should amend current exposition to account for CAMO.A.150(a)(1) before 31st July 2026. In case of non-compliance with CAMO.A.150(a)(2)/(a)(3)/(b), an oversight finding should be raised and managed i.a.w. relevant APM.
N/A –not explicit requirement in CAR-MG	CAMO.A.155 – Immediate reaction to a safety problem	Potential transition finding: "Due to on-going transition from CAR-M subpart G to CAR-CAMO, current exposition procedure is not compliant with CAMO.A.155". CAMO.A.155 add a new requirement to implement any safety measures mandated by DGCA and any relevant mandatory safety information issued by DGCA. Even if newly formally introduced through CAMO.A.155, this requirement is not considered as a novelty and apart from the case of the exposition update to account for that new article (refer to above transition finding), in case of non-compliance with CAMO.A.155, an oversight finding should be raised and managed i.a.w. relevant APM.
N/A – Previous M.A.202 requirement transferred into CAR-CAMO	CAMO.A.160 – Occurrence reporting	A new CAMO.A.160 Occurrence reporting is added to introduce the occurrence reporting requirements applicable to CAMOs. As similar M.A.202 requirement applied to CAR-MG organisation, CAMO.A.160 is not considered as a novelty and in case of non-compliance with CAMO.A.160, an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.712 – Quality system	CAMO.A.200 – Management system	Potential transition finding: "Due to on-going transition from CAR-M subpart G to CAR-CAMO, current exposition procedure is not compliant with CAMO.A.200(a)(2)/(a)(3)/(a)(5)". The organisation should amend current exposition quality system procedure to account for CAMO.A.200 and CAMO.A.202. Main novelties compared to M.A.712 are: • CAMO.A.200(a)(2): Safety policy. • CAMO.A.200(a)(3): identification of aviation safety hazards and management of associated risks. • CAMO.A.200(a)(5): documentation of all management system key processes. In case of non-compliance with CAMO.A.200(a)(1)/(a)(4)/(a)(6)/(a)(7)/(b)/(c)/(d) an oversight finding should be raised and managed i.a.w. relevant APM.
	CAMO.A.202 – Internal safety reporting scheme	Potential transition finding: "Due to on-going transition from CAR-M subpart G to CAR-CAMO, current exposition does not contain necessary provisions to address CAMO.A.160 requirements". A new CAMO.A.202 Internal safety reporting scheme is added to establish an internal reporting scheme supporting the organisation's hazard identification and safety risk management processes and fostering its safety culture. The internal reporting scheme shall also be accessible to organisations working under the CAMO's management system. It also forms the basis for establishing mandatory and voluntary occurrence reporting as required by AAC 02 of 2024. The organisation should amend its procedures to account for CAMO.A.202 before 31st July 2026.

Potential transition findings are identified in blue		
CAR-M subpart G requirement where applicable	CAR-CAMO requirement	Oversight policy to be applied to grandfathered CAR-CAMO from 01 January 2025 to 31st July 2026
N/A - New requirement introduced in CAR-CAMO	CAMO.A.205 – Contracting and subcontracting	Potential transition finding: "Due to on-going transition from CAR-M subpart G to CAR-CAMO, current exposition procedure is not compliant with CAMO.A.205(a)(2)". A new CAMO.A.205 Contracting and subcontracting is added to clarify the responsibility of the CAMO to ensure that any contracting (maintenance) or subcontracting (specific continuing-airworthiness-management-related activities) complies with applicable requirements. In this context it is important to clarify that the term 'subcontracting' covers cases where the contracted organisation is itself CAR-CAMO or CAR-CAO approved and cases where such organisation is not CAR-CAMO/CAR-CAO approved. Any continuing-airworthiness-management related services provided by third parties are to be considered 'subcontracting under the management system' for the purpose of CAR-CAMO. The organisation should amend current exposition to account for CAMO.A.205(a)(2) before 31st July 2026. In case of non-compliance with CAMO.A.205(a)(1)(b), an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.705 - Facilities	CAMO.A.215 - Facilities	In case of non-compliance with CAMO.A.215, an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.714(a)(1)/(a)(3)/(a)(4)/(a)(5)/(a)(6)/(f)/(e) – Records-keeping	CAMO.A.220(a)(1)/(a)(3)/(a)(4)/(a)(6)/(d)/(f) – Records-keeping	In case of non-compliance with CAMO.A.220(a)(1)/(a)(3)/(a)(4)/(a)(6)/(d)/(f), an oversight finding should be raised and managed i.a.w. relevant APM. The record-keeping duration for aircraft related records is changed to 3 years after the responsibility for the aircraft has been permanently transferred, to align with the validity of the airworthiness review certificate (ARC) and 1 year for aircraft permanently withdrawn from service. In addition, record keeping duration for personnel records is 3 years after a person has left the organisation. This will ensure that for any ARC issued, personnel records will remain accessible for the entire ARC validity, including in the case a person has left the CAMO shortly after an ARC was issued.
N/A – New requirement introduced by CAR-CAMO	CAMO.A.220(a)(2)/(a)(5)/(b)/(e) – Records-keeping	Potential transition finding: "Due to on-going transition from CAR-M subpart G to CAR-CAMO, current exposition is not compliant with CAMO.A.220(a)(2)/(a)(5)/(b)/(e)". CAMO.A.220 Record-keeping includes management-system-. A record-keeping duration of 5 years for management-system-related records is introduced. In addition, the organisation shall record all details of work carried out and the format of the records shall be specified in the organisation's manual.
M.A.706(h) – Personnel M.A.707(e) – Airworthiness Review Staff	CAMO.A.220(c) – Records-keeping	Potential transition finding: "Due to on-going transition from CAR-M subpart G to CAR-CAMO, current exposition is not compliant with CAMO.A.220(c)". CAMO.A.220 Record-keeping includes personnel related record-keeping. Personnel-related records (qualification and experience) shall include personnel involved in safety management and be kept until 3 years after a person has left the organisation.
M.A.707(e) – Airworthiness Review Staff	CAMO.A.220(c)(1)(ii)/(2)/(3) – Records-keeping	In case of non-compliance with CAMO.A.220(c)(1)(ii)/(c)(2)/(c)(3), an oversight finding should be raised and managed i.a.w. relevant APM except if corresponding records have been kept for only 2 years.

Potential transition findings are identified in blue		
CAR-M subpart G requirement where applicable	CAR-CAMO requirement	Oversight policy to be applied to grandfathered CAR-CAMO from 01 January 2025 to 31st July 2026
M.A.704 – Continuing Airworthiness management exposition	CAMO.A.300 – Continuing airworthiness management exposition	Potential transition finding: “Due to on-going transition from CAR-M subpart G to CAR-CAMO, current exposition is not compliant with CAMO.A.300”. CAMO.A.300 include additional management-system-related elements, such as: - the safety policy, - a description of the internal safety reporting scheme (CAMO.A.202), - a general description of how the organisation ensures availability of staff (CAMO.A.305(d)), - a procedure defining the scope of changes not requiring prior approval and describing how such changes will be managed and notified (CAMO.A.115(b) and CAMO.A.130(c)), the procedures specifying how the organisation controls any contracted or subcontracted tasks, including contracted maintenance (CAMO.A.315(c)), - The compliance statement in point (a)(1) is amended to cover all CAR-M, CAR-ML, and CAR-CAMO requirements, as applicable. - In point (a)(11), additional clarification is provided on the procedures required specifying how the organisation ensures compliance with CAR-CAMO, CAR-M and CAR-ML. - In point (a)(9), now (a)(12), the requirement for a list of approved maintenance programmes is clarified, by stating this is only relevant for aircraft for which a contract exists for continuing airworthiness management, not being required for initial approval of the CAMO. Accordingly, baseline and generic maintenance programmes are no longer required (see also CAMO.A.325). - Point (b) is reviewed to specify that the initial CAME is subject to DGCA approval. - A requirement to maintain the CAME to remain an up-to-date description of the organisation is also added. - Point (c) on amendments to the CAME refers to the changes requiring prior approval (cf. CAMO.A.130(a)) and to the new provisions on managing changes without prior DGCA approval, based on an agreed procedure. The organisation should amend current exposition to account for CAMO.A.300. As long as the organisation is not fully compliant with CAR-CAMO, any non-compliance with CAMO.A.300 should be classified as a transition finding except when there is a non-compliance with M.A.704 which should be classified i.a.w. relevant APM.
M.A.706(a)/(b)/(c)/(d)/(e)/(f)/(g)/(i)/(j)/(k) – Personnel requirements (also M.A.712(a))	CAMO.A.305(a)(1)/(a)(3)/(a)(4)/(a)(6)/(a)(7)/(b)/(c)/(d)/(e)/(f)/(g) – Personnel requirements	In case of non-compliance with CAMO.A.305(a)(1)/(a)(3)/(a)(4)/(a)(6)/(a)(7)/(b)/(c)/(d)/(e)/(f)/(g), an oversight finding should be raised and managed i.a.w. relevant APM except if the non-compliance concerns understanding of safety management and human factors principles appropriate to the person's function and responsibilities where a transition finding should be raised.

Potential transition findings are identified in blue		
CAR-M subpart G requirement where applicable	CAR-CAMO requirement	Oversight policy to be applied to grandfathered CAR-CAMO from 01 January 2025 to 31st July 2026
N/A - New requirement introduced in CAR-CAMO	CAMO.A.305(a)(2)/(a)(5) – Personnel requirements	Potential transition finding: "Due to on-going transition from CAR-M subpart G to CAR-CAMO, current exposition is not compliant with CAMO.A.305(a)(2)/(a)(5)". - CAMO.A.305 includes the nomination of a person or group of persons for the compliance monitoring function and for safety-management related responsibilities, to clarify the responsibilities of the accountable manager, and to state that competence must include an understanding of the application of safety management and human factors principles and human performance issues. - Additional changes are made to improve the overall structure of this CAR and to clarify the link with Rule 134 of the Aircraft Rules, 1937 and related CARs. In particular, point (b)(1) states that for organisations also approved as an air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937, the accountable manager shall be the person appointed as accountable manager for the air carrier. - A requirement is added for a system to plan the availability of staff to ensure that the organisation has sufficient appropriately qualified staff to plan, perform, supervise, inspect and monitor its activities in accordance with the terms of approval (new point (d)). - A new point (e) is added to include in CAMO.A.305 the reference to airworthiness review staff currently embedded in M.A.707 point (a). This way, CAMO.A.305 includes the requirements for all categories of staff and CAMO.A.310 may concentrate on airworthiness review staff qualification requirements.
M.A.707 – Airworthiness review staff	CAMO.A.310 – Airworthiness review staff qualification	In case of non-compliance with CAMO.A.310, an oversight finding should be raised and managed i.a.w. relevant APM except if the non-compliance concerns understanding of safety management and human factors principles by Airworthiness Review Staff where a transition finding should be raised. - specific qualification requirements not applicable within the scope of CAR-CAMO are removed. - Point (d) on listing airworthiness review staff in the CAME is deleted as this is already addressed in point CAMO.A.300(a)(8). - These airworthiness review staff qualifications apply regardless of the aircraft managed, meaning for example that a CAR-CAMO-approved organisation performing airworthiness reviews of aircraft other than CMPA may not use airworthiness review staff complying with the 'lower' requirements of the new CAR-CAO.

Potential transition findings are identified in blue		
CAR-M subpart G requirement where applicable	CAR-CAMO requirement	Oversight policy to be applied to grandfathered CAR-CAMO from 01 January 2025 to 31st July 2026
M.A.708 – Continuing airworthiness management	CAMO.A.315 – Continuing airworthiness management	In case of non-compliance with CAMO.A.315, an oversight finding should be raised and managed i.a.w. relevant APM except in case of non-compliance with CAMO.A.315(b)(4) (default in using the organisation's safety risk management process) where a transition finding should be raised. • CAMO.A.315 Continuing airworthiness management is reviewed to eliminate overlaps with M.A.301. The underlying principle is that purely technical requirements are included in CAR-M and that CAR-CAMO focuses on the related organisational responsibilities. This will improve consistency and facilitate future amendments. • Additional changes are made to update relevant cross references. As a CAR-CAMO-approved organisation may also manage the continuing airworthiness of other than CMPA or of aircraft not used by air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937, references to CAR-CAO organisations are added and references to Subpart F maintenance organisations are maintained (to allow for a smooth transition to CAR-CAO, Subpart F will be maintained during the transition period). • Point (e) is added to include a requirement for human factors principles and human performance limitations to be taken into account for any continuing airworthiness management tasks.
M.A.710 – Airworthiness review	CAMO.A.320 – Airworthiness review	In case of non-compliance with CAMO.A.320, an oversight finding should be raised and managed i.a.w. relevant APM. The text of existing M.A.710 is replaced with a requirement to follow CAR-M Section A point M.A.901. The specific elements constituting the airworthiness review process are transferred to those CAR-M.
M.A.709 – Documentation	CAMO.A.325 – Continuing airworthiness management data	In case of non-compliance with CAMO.A.325, an oversight finding should be raised and managed i.a.w. relevant APM. CAMO.A.325 Continuing airworthiness management data is changed for consistency to reflect the scope of the new CAR-CAMO and to update the relevant cross references. Point (b) is deleted as the requirement to produce baseline or generic maintenance programmes is not maintained.

Appendix III — CAR-CAO vs CAR-MG Correspondence table and transition oversight policy

Potential transition findings are identified in blue		
CAR-M subpart G requirement where applicable	CAR-CAO requirement	Oversight policy to be applied to grandfathered CAR-CAO from 01 January 2025 to 31st July 2026
M.A.702 - Application	CAO.A.015 – Application for an organisation certificate	In case of non-compliance with CAO.A.015, an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.703 – Extend of approval	CAO.A.020 – Terms of approval	Potential transition finding: “Due to on-going transition from CAR-M subpart G to CAR-CAO, current exposition is not compliant with CAO.A.020 requirements”. The above transition finding is meant to address format changes in the way the scope of work is described in the organisation manual. In case the grandfathered CAR-CAO organisation uses privileges on aircraft/ component that are out of its scope, an oversight finding should be raised against CAO.A.020. The organisation should amend its scope of work as specified by CAO.A.020 before 31st July 2026 or completion of transition process.
M.A.704 – Continuing Airworthiness management exposition	CAO.A.025 – Combined airworthiness exposition	Potential transition finding: “Due to on-going transition from CAR-M subpart G to CAR-CAO, current exposition is not compliant with CAO.A.025”. Structure of the CAE is as follows: - The CAE is made of the 4 following parts: - Part A – General description - Part B - General procedures - Part C – Maintenance procedures - Part D – Continuing airworthiness management procedures - Part E – Supporting documents - Organisation grandfathered as CAR-CAO based on a CAR-MG should prepare a CAE which covers Part A, Part B, Part D and Part E. To help the organisation in preparing the CAE based on existing exposition: - A table comparing CAE with CAR-MG exposition is available in annex 2-2, and - A detailed table of content of the CAE along with CAO requirements to be covered by each section of the CAE is provided in AMC1 CAO.A.025. The organisation should develop a CAE to account for CAO.A.025. As long as the organisation is not fully compliant with CAR-CAO, any non-compliance with CAO.A.025 should be classified as a transition finding except when there is a non-compliance with M.A.704 which should be classified i.a.w. relevant APM.
M.A.705 - Facilities	CAO.A.030 - Facilities	In case of non-compliance with CAO.A.030, an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.706 - Personnel requirements	CAO.A.035 – Personnel requirements	In case of non-compliance with CAO.A.035, an oversight finding should be raised and managed i.a.w. relevant APM.

Potential transition findings are identified in blue		
CAR-M subpart G requirement where applicable	CAR-CAO requirement	Oversight policy to be applied to grandfathered CAR-CAO from 01 January 2025 to 31 st July 2026
M.A.708(a)/(b) / (c)/(d) – Continuing airworthiness management	CAO.A.075(a)/(b)– Continuing airworthiness management	In case of non-compliance with CAO.A.075(a)/(b), an oversight finding should be raised and managed i.a.w. relevant APM. CAO.A.075 Continuing airworthiness management is reviewed to eliminate overlaps with M.A.301 and ML.A.301. The underlying principle is that purely technical requirements are included in CAR-M and CAR-ML and that CAR-CAO focuses on the related organisational responsibilities. This will improve consistency and facilitate future amendments.
M.A.709 – Documentation	CAO.A.080 – Continuing airworthiness management data	In case of non-compliance with CAO.A.080, an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.714 – Records-keeping	CAO.A.090(a)(2)/(a)(3)/(a)(4)/(c)/(d)/(e)/(f)/(g)(2) – Records- keeping	In case of non-compliance with CAO.A.090(a)(2)/(a)(3)/(a)(4)/(c)/(d)/(e)/(f)/(g)(2), an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.711 – Privileges of the organisation	CAO.A.095(b)/(c)/(d)/(e) – Privileges of the organisation	In case of non-compliance with CAO.A.095(b)(1)/(b)(3)/(b)(4)/(c)/(d)/(e), an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.712 – Quality system	CAO.A.100 – Quality system and organisational review	In case of non-compliance with CAO.A.100, an oversight finding should be raised and managed i.a.w. relevant APM. A CAR-CAO can elect to replace its quality system by an organizational review when one of the following condition is met: • The scope of the CAO does only contain aircraft covered by CAR-ML • The CAO does not exceed 10 full-time equivalent staff involved in maintenance. • The CAO does not exceed 5 full-time equivalent staff involved in continuing airworthiness management.
M.A.713 – Changes to the approved continuing airworthiness organisation	CAO.A.105 – Changes to the organisation	Potential transition finding: “Due to on-going transition from CAR-M subpart G to CAR-CAO, current exposition does not contain necessary provisions to address CAO.A.105 requirements”. CAR-CAO mandate the organisation to have a procedure to address changes not requiring prior approval. Changes not requiring prior approval will be managed as agreed between the organisation and DGCA. The organisation should develop a procedure to account for CAO.A.105 before 31 st July 2026. Until the organisation is fully compliant with CAR-CAO, changes to the organisation should be managed i.a.w. the organisation current approved procedure. As a result, in case of non compliance with M.A.713 and/or with the current procedure in place within the organisation, an oversight finding should be raised and managed i.a.w. relevant APM.

Potential transition findings are identified in blue		
CAR-M subpart G requirement where applicable	CAR-CAO requirement	Oversight policy to be applied to grandfathered CAR-CAO from 01 January 2025 to 31 st July 2026
M.A.715 – Continued validity of approval	CAO.A.110 – Continued validity	Minor changes are made to update references and for consistency throughout the new CAR-CAO. In case of non-compliance with CAO.A.110, an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.716 - Findings	CAO.A.115 – Findings	In case of non-compliance with CAO.A.115, an oversight finding should be raised and managed i.a.w. relevant APM.

Appendix IV – CAR-CAO vs CAR-MF Correspondence table and transition oversight policy

Potential transition findings are identified in blue		
CAR-M subpart F requirement applicable where	CAR-CAO requirement	Oversight policy to be applied to grandfathered CAR-CAO from 01 January 2025 to 31 st July 2026
M.A.602 - Application	CAO.A.015 – Application for an organisation certificate	In case of non-compliance with CAO.A.015, an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.603 – Extend of approval	CAO.A.020 – Terms of approval	Potential transition finding: “Due to on-going transition from CAR-M subpart F to CAR-CAO, current manual is not compliant with CAO.A.020 requirements”. The above transition finding is meant to address format changes in the way the scope of work is described in the organisation manual. In case the grandfathered CAR-CAO organisation uses privileges on aircraft/ component that are out of its scope, an oversight finding should be raised against CAO.A.020. The organisation should amend its scope of work as specified by CAO.A.020 before 31st July 2026. CAO.A.020(a)(3) introduces the following limitation: a CAO which employs only one person for both planning and carrying out of all maintenance tasks cannot hold privileges for the maintenance of: • aeroplanes equipped with a turbine engine (in the case of aircraft-rated organisations); • helicopters equipped with a turbine engine or with more than one piston engine (in the case of aircraft-rated organisations); • complete piston engines of 450 HP and above (in the case of engine-rated organisations); and • complete turbine engines (in the case of engine-rated organisations). Current CAR-MF organisation being in one of the above situation cannot be grandfathered as a CAR-CAO.

Potential transition findings are identified in blue		
CAR-M subpart F requirement where applicable	CAR-CAO requirement	Oversight policy to be applied to grandfathered CAR-CAO from 01 January 2025 to 31 st July 2026
M.A.604 – Maintenance organisation manual	CAO.A.025 – Combined airworthiness exposition	Potential transition finding: "Due to on-going transition from CAR-M subpart F to CAR-CAO, current manual is not compliant with CAO.A.025". Structure of the CAE is as follows: - The CAE is made of the 4 following parts: - Part A – General description - Part B - General procedures - Part C – Maintenance procedures - Part D – Continuing airworthiness management procedures - Part E – Supporting documents - Organisation grandfathered as CAR-CAO based on a CAR-MF should prepare a CAE which covers Part A, Part B, Part C and Part E. To help the organisation in preparing the CAE based on existing manual: - A table comparing CAE with CAR-MF manual is available in annex 3-2, and - A detailed table of content of the CAE along with CAO requirements to be covered by each section of the CAE is provided in AMC1 CAO.A.025. The organisation should develop a CAE to account for CAO.A.025. As long as the organisation is not fully compliant with CAR-CAO, any non-compliance with CAO.A.025 should be classified as a transition finding except when there is a non compliance with M.A.604 which should be classified i.a.w. relevant APM.
M.A.605 - Facilities	CAO.A.030 - Facilities	In case of non-compliance with CAO.A.030, an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.606(a)/(b)/(c)/(d)/(e)/(f) - Personnel requirements	CAO.A.035 – Personnel requirements	In case of non-compliance with CAO.A.035, an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.606(g)/(h) – Personnel requirements	CAO.A.040(c) – Certifying staff	In case of non-compliance with CAO.A.040(c), an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.607 – Certifying staff and airworthiness review staff	CAO.A.040(a)/(b)/(d) – Certifying staff	In case of non-compliance with CAO.A.040(a)/(b)/(d), an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.608 – Components, equipment and tools	CAO.A.050 – Components, equipment and tools	In case of non-compliance with CAO.A.050, an oversight finding should be raised and managed i.a.w. relevant APM. CAO.A.050(b) requires the organisation to have a procedure to ensure that it has access to all equipment and tools necessary to carry out its work, used only on an occasional basis.
M.A.609 – Maintenance data	CAO.A.055(a) – Maintenance data and work orders	In case of non-compliance with CAO.A.055(a), an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.610 – Maintenance work orders	CAO.A.055(b) – Maintenance data and work orders	In case of non-compliance with CAO.A.055(b), an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.611 – Maintenance standards	CAO.A.060 – Maintenance standards	In case of non-compliance with CAO.A.060, an oversight finding should be raised and managed i.a.w. relevant APM.

Potential transition findings are identified in blue		
CAR-M subpart F requirement applicable where	CAR-CAO requirement	Oversight policy to be applied to grandfathered CAR-CAO from 01 January 2025 to 31st July 2026
M.A.612 – Certificate of release to service	CAO.A.065 – Aircraft certificate of release to service	In case of non-compliance with CAO.A.065, an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.613 – Component certificate of release to service	CAO.A.070 – Component certificate of release to service	In case of non-compliance with CAO.A.070, an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.609 – Documentation	CAO.A.080 – Continuing airworthiness management data	In case of non-compliance with CAO.A.080, an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.614 – Maintenance and airworthiness review records	CAO.A.090 – Records-keeping	In case of non-compliance with CAO.A.090, an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.615(a)/(b)/(c)/(d) – Privileges of the organisation	CAO.A.095(a)(1)/(a)(2)/(a)(3)/(a)(4)/(c)(2)/(d) – Privileges of the organisation	In case of non-compliance with CAO.A.095(a)(1)/(a)(2)/(a)(3)/(a)(4)/(c)(2)/(d), an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.616 – Organisational review	CAO.A.100(f) – Quality system and organisational review	In case of non-compliance with CAO.A.100(f), an oversight finding should be raised and managed i.a.w. relevant APM. A Part-CAO can elect to replace its quality system by an organisational review when one of the following condition is met: • The scope of the CAO does only contain aircraft covered by Part-ML • The CAO does not exceed 10 full-time equivalent staff involved in maintenance • The CAO does not exceed 5 full-time equivalent staff involved in continuing airworthiness management
M.A.617 – Changes to the approved continuing airworthiness organisation	CAO.A.105 – Changes to the organisation	Potential transition finding: “Due to on-going transition from CAR-M subpart F to CAR-CAO, current manual does not contain necessary provisions to address CAO.A.105 requirements”. CAR-CAO mandates the organisation to have a procedure to address changes not requiring prior approval. Changes not requiring prior approval will be managed as agreed between the organisation and the authority. The organisation should develop a procedure to account for CAO.A.105 before 31st July 2026. Until the organisation is fully compliant with CAR-CAO, changes to the organisation should be managed i.a.w. the organisation current approved procedure. As a result, in case of non-compliance with M.A.617 and/or with the current procedure in place within the organisation, an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.618 – Continued validity of approval	CAO.A.110 – Continued validity	Minor changes are made to update references and for consistency throughout the new CAR-CAO. In case of non-compliance with CAO.A.110, an oversight finding should be raised and managed i.a.w. relevant APM.
M.A.619 – Findings	CAO.A.115 – Findings	In case of non-compliance with CAO.A.115, an oversight finding should be raised and managed i.a.w. relevant APM.

Appendix V – CAR-CAO vs CAR-145 Correspondence table and transition oversight policy

Potential transition findings are identified in blue		
CAR-145 requirement where applicable	CAR-CAO requirement	Oversight policy to be applied to grandfathered CAR-CAO from 01 January 2025 to 31st July 2026
145.A.15 - Application	CAO.A.015 – Application for an organisation certificate	In case of non-compliance with 145.A.15, an oversight finding should be raised and managed i.a.w. relevant APM.
145.A.20 – Terms of approval	CAO.A.020 – Terms of approval	Potential transition finding: “Due to on-going transition from CAR-145 to CAR-CAO, current exposition is not compliant with CAO.A.020 requirements”. The above transition finding is meant to address format changes in the way the scope of work is described in the organisation manual. In case the grandfathered CAR-CAO organisation uses privileges on aircraft/component that are out of its scope, an oversight finding should be raised against CAO.A.020. The organisation should amend its scope of work as specified by CAO.A.020 before 31st July 2026. CAO.A.020(a)(3) introduces the following limitation: a CAO which employs only one person for both planning and carrying out of all maintenance tasks cannot hold privileges for the maintenance of: • aeroplanes equipped with a turbine engine (in the case of aircraft-rated organisations); • helicopters equipped with a turbine engine or with more than one piston engine (in the case of aircraft-rated organisations); • complete piston engines of 450 HP and above (in the case of engine-rated organisations); and • complete turbine engines (in the case of engine-rated organisations). Current CAR-145 organisation being in one of the above situation cannot be grandfathered as a CAR-CAO.

Potential transition findings are identified in blue

CAR-145 requirement where applicable	CAR-CAO requirement	Oversight policy to be applied to grandfathered CAR-CAO from 01 January 2025 to 31st July 2026
145.A.70 – Maintenance organisation exposition	CAO.A.025 – Combined airworthiness exposition	Potential transition finding: "Due to on-going transition from CAR-145 to CAR-CAO, current exposition is not compliant with CAO.A.025". Structure of the CAE is as follows: - The CAE is made of the 4 following parts: - Part A – General description - Part B - General procedures - Part C – Maintenance procedures - Part D – Continuing airworthiness management procedures - Part E – Supporting documents - Organisation grandfathered as CAR-CAO based on a CAR-145 should prepare a CAE which covers Part A, Part B, Part C and Part E. To help the organisation in preparing the CAE based on existing manual: - A table comparing CAE with CAR-145 exposition is available in annex 4-2, and - A detailed table of content of the CAE along with CAO requirements to be covered by each section of the CAE is provided in AMC1 CAO.A.025. The organisation should develop a CAE to account for CAMO.A.025. As long as the organisation is not fully compliant with CAR-CAO, any non-compliance with CAO.A.025 should be classified as a transition finding except when there is a non-compliance with 145.A.70 which should be classified i.a.w. relevant APM.
145.A.25 - Facilities	CAO.A.030 – Facilities CAO.A.060(b)/(f) – Maintenance standards	In case of non-compliance with CAO.A.030 or CAO.A.060(b)/(f), an oversight finding should be raised and managed i.a.w. relevant APM.
145.A.30(a)/(b)/(d)/(e)/(f) - Personnel requirements	CAO.A.035 – Personnel requirements	In case of non-compliance with CAO.A.035, an oversight finding should be raised and managed i.a.w. relevant APM.
145.A.30(g)/(h)/(i)/(j)(3)/(j)(4)/(j)(5) – Personnel requirements	CAO.A.040(a)/(b)/(c) – Certifying staff CAO.A.060(a) – Maintenance standards	In case of non-compliance with CAO.A.040 or CAO.A.060(a), an oversight finding should be raised and managed i.a.w. relevant APM. Provisions given by 145.A.30(j)(1)/(j)(2) are not available in CAR-CAO.
145.A.35(j) – Certifying staff and support staff	CAO.A.040(d) – Certifying staff	In case of non-compliance with CAO.A.040(d), an oversight finding should be raised and managed i.a.w. relevant APM.

Potential transition findings are identified in blue		
CAR-145 requirement where applicable	CAR-CAO requirement	Oversight policy to be applied to grandfathered CAR-CAO from 01 January 2025 to 31st July 2026
145.A.35(a)/(b)/(c)/(d)/(e)/(f)/(g)/(h)/(i)/(k)/(l)/(m)/(n) – Certifying staff and support staff	N/A – No equivalent requirement in CAR-CAO	In CAR-CAO there is no “base” and “line” maintenance and therefore there is no “support staff” vs “certifying staff”. As stated in CAO.A.040, Certifying staff shall exercise their privileges to release maintenance if the CAO has ensured: - that these certifying staff meet the requirements of point (b) of point 66.A.20 or point 66.A.215 of CAR 66; - that these certifying staff have an adequate understanding of the relevant aircraft or aircraft component(s) to be maintained, or both, as well as of the organisation procedures required to perform such maintenance. In case of open non-compliance against 145.A.35(a)(b)(c)(d)(e)(f)(g)(h)(i)(k)(l)(m)(n) when the organisation is grandfathered as a CAR-CAO, compliance against CAO.A.040 should be evaluated and if the situation is compliant with CAO.A.040, the finding should be cancelled.
145.A.40 – Equipment and tools	CAO.A.050(a)/(b) – Components, equipment and tools CAO.A.060(d) – Maintenance standard	In case of non-compliance with CAO.A.050(a)/(b) or CAO.A.060(d), an oversight finding should be raised and managed i.a.w. relevant APM.
145.A.42 – Components	CAO.A.050(c) – Components, equipment and tools	In case of non-compliance with CAO.A.050(c), an oversight finding should be raised and managed i.a.w. relevant APM.
145.A.45(a)/(b)/(e)/(f)/(g) – Maintenance data 145.A.48(d) – Performance of maintenance	CAO.A.055(a)/(b) – Maintenance data and work orders CAO.A.060(c)/(e)/(j) – Maintenance standard	In case of non-compliance with CAO.A.055(a) or CAO.A.060(c)/(e)/(j), an oversight finding should be raised and managed i.a.w. relevant APM. 145.A.45(b) requirement are applicable to CAR-CAO organisation through a reference to M.A.401 and ML.A.401. - There is no requirement equivalent to 145.A.45(c)/(d) in CAR-CAO
145.A.45(c)/(d) – Maintenance data	N/A – No equivalent requirement in CAR-CAO	Open findings against 145.A.45(c)(d) at the time of grandfathering should be cancelled.
145.A.65(b)(1) – Safety and quality policy, maintenance procedures and quality system	CAO.A.055(b) – Maintenance data and work orders	In case of non-compliance with CAO.A.055(b), an oversight finding should be raised and managed i.a.w. relevant APM.
145.A.47 – Production planning	N/A – No equivalent requirement in CAR-CAO	There is no requirement to produce and maintain a production planning as required by 145.A.47 in CAR-CAO. However; as mention in CAO.A.035(d), the CAO shall demonstrate having sufficient appropriately qualified staff for it to be able to carry out the planned work
145.A.48(a)/(b)/(c) – Performance of maintenance	CAO.A.060(g)/(h)/(i) – Maintenance standards	In case of non-compliance with CAO.A.060(g)/(h)/(i), an oversight finding should be raised and managed i.a.w. relevant APM.
145.A.50(a)/(b)/(c)/(e)/(f) – Certification of maintenance	CAO.A.065 – Aircraft certificate of release to service	In case of non-compliance with CAO.A.065, an oversight finding should be raised and managed i.a.w. relevant APM. Aircraft release to service requirement are different in CAR-CAO compared to CAR-145 (no need of “C” licensed staff, no difference between “base” and “line” maintenance, etc. Even if the organisation complies with CAR-145 and CAO.A.065, the release to service procedure needs to be amended to account for these changes.
145.A.50(d) – Certification of maintenance	CAO.A.070 – Component certificate of release to service	In case of non-compliance with CAO.A.070, an oversight finding should be raised and managed i.a.w. relevant APM.

Potential transition findings are identified in blue		
CAR-145 requirement where applicable	CAR-CAO requirement	Oversight policy to be applied to grandfathered CAR-CAO from 01 January 2025 to 31st July 2026
145.A.55 – Maintenance and airworthiness review records	CAO.A.090(a)(1)/(b)/(c)/(d)/(e)/(f)/(g)(1) – Record-keeping	In case of non-compliance with CAO.A.090(a)(1)/(b)/(c)/(d)/(e)/(f)/(g)(1), an oversight finding should be raised and managed i.a.w. relevant APM.
145.A.75(a)/(b)/(c)/(d)/(e) – Privileges of the organisation	CAO.A.095(a)(1)/(a)(2)/(a)(3)/(a)(4) – Privileges of the organisation	In case of non-compliance with CAO.A.095(a)(1)/(a)(2)/(a)(3)/(a)(4), an oversight finding should be raised and managed i.a.w. relevant APM.
145.A.65(a)/(b)(2) – Safety and quality policy, maintenance procedures and quality system	CAO.A.100 – Quality system and organisational review	In case of non-compliance with CAO.A.100, an oversight finding should be raised and managed i.a.w. relevant APM. A CAR-CAO can elect to replace its quality system by an organisational review when one of the following condition is met: • The scope of the CAO does only contain aircraft covered by CAR-ML • The CAO does not exceed 10 full-time equivalent staff involved in maintenance • The CAO does not exceed 5 full-time equivalent staff involved in continuing airworthiness management
145.A.85 – Changes to the approved continuing airworthiness organisation	CAO.A.105 – Changes to the organisation	Potential transition finding: “Due to on-going transition from CAR-145 to CAR-CAO, current exposition does not contain necessary provisions to address CAO.A.105 requirements”. As opposed to CAR-145 where approval of the exposition can optionally be performed through indirect approvals, CAR-CAO mandate the organisation to have a procedure to address changes not requiring prior approval. Changes not requiring prior approval will be managed as agreed between the organisation and DGCA. The organisation should develop a procedure to account for CAO.A.105 before 31st July 2026. Until the organisation is fully compliant with CAR-CAO, changes to the organisation should be managed i.a.w. the organisation current approved procedure. As a result, in case of non compliance with 145.A.85 and/or with the current procedure in place within the organisation, an oversight finding should be raised and managed i.a.w. relevant APM.
145.A.90 – Continued validity of approval	CAO.A.110 – Continued validity	Minor changes are made to update references and for consistency throughout the new CAR-CAO. In case of non-compliance with CAO.A.110, an oversight finding should be raised and managed i.a.w. relevant APM.
145.A.95 - Findings	CAO.A.115 – Findings	In case of non-compliance with CAO.A.115, an oversight finding should be raised and managed i.a.w. relevant APM.

Appendix VI — Comparison CAE with CAR-145 MOE

Chapter	Description	CAR reference	MOE chapter	MOE chapter description
PART A – GENERAL DESCRIPTION				
A.1	Statement by accountable manager	CAO.A.025(a)(1); CAO.A.035(a)	1.1	Corporate commitment by the accountable manager
A.2	General presentation of the organisation	CAO.A.035(a); CAO.A.100(e)	0	GENERAL ORGANISATION (Operators within the European Union)
A.3	Description and location of the facilities	CAO.A.025(a)(9); CAO.A.030	1.8	General description of the facilities at each address intended to be approved
			5.3	List of Line maintenance locations as per 145.A.75(d)
A.4	Scope of work	CAO.A.020(a); CAO.A.025(a)(2); CAO.A.095(e); Appendix I point (a)	1.9	Organisations intended scope of work
A.5	Exposition amendments and changes to the organisation	CAO.A.025(a)(11)/(c); CAO.A.105	1.10	Notification procedure to DGCA regarding changes to the organisation's activities/approval/location/personnel
			1.11	Exposition amendment procedures including, if applicable, delegated procedures
A.6	Reserved			
A.7	Management personnel	CAO.A.025(a)(3); CAO.A.035(b); CAO.A.100(a)	1.3	Management personnel
			1.4	Duties and responsibilities of the management personnel
A.8	Organisation chart	CAO.A.025(a)(4)	1.5	Management organisation chart
A.9	Manpower resources	CAO.A.035(d)	1.7	Manpower resources
			2.22*	Control of manhour planning versus scheduled maintenance work
			2.28*	Production planning procedures
A.10	List of certifying staff	CAO.A.025(a)(5)	1.6	List of certifying staff, support staff and airworthiness review staff
A.11	Reserved			

Chapter	Description	CAR reference	MOE chapter	MOE chapter description
A.12	Reserved			
A.13	Reserved			
PART B – GENERAL PROCEDURES				
B.1	Quality (or organisational review) system	CAO.A.100(a)/(b)/(d)/(e)/(f)	1.2*	Safety and quality policy
			3.3	Quality audit remedial action procedure
			3.10	Concession control for deviation from organisations' procedures
			3.12	Control of manufacturers' and other maintenance working teams
B.2	Audit plan (or frequency and content of organisational review)	CAO.A.100(b)/(f)	3.1	Quality audit of organisation procedures
			3.2	Quality audit of aircraft
B.3	Monitoring of maintenance contracts	CAO.A.100(b)(2)	2.10	Aircraft maintenance programme compliance
			2.11	Airworthiness directives procedure
			3.9	Aircraft or aircraft component maintenance tasks exemption process control
B.4	Qualification, assessment and training of staff	CAO.A.035(c)/(d)/(e)/(f); CAO.A.040(a); CAO.A.060(a)	3.4	Certifying staff and support staff qualification and training procedures
			3.6	Quality audit personnel
			3.7	Qualifying inspectors
			3.8	Qualifying mechanics
			3.11	Qualification procedure for specialised activities such as NDT welding, etc.
			3.13*	Human factors training procedure
			3.14	Competence assessment of personnel
			3.15	Training procedures for on-the-job training as per Section 6 of Appendix III to CAR-66
			3.16	Procedure for the issue of a recommendation to DGCA for the issue of a CAR-66 licence in accordance with

Chapter	Description	CAR reference	MOE chapter	MOE chapter description
				66.B.105 of APM Part II Chapter 17.
B.5	One-off certification authorisation	CAO.A.040(b)		
B.6	Limited certification authorisation	CAO.A.040(c)		
B.7	Subcontracting	CAO.A.095(a)(2)/(b)(3); CAO.A.100(f)	2.1	Supplier evaluation and subcontract control procedure
B.8	Maintenance data and continuing airworthiness management data	CAO.A.055(a); CAO.A.080	2.8	Maintenance instructions and relationship to aircraft/ aircraft component manufacturers' instructions including updating and availability to staff
			2.13	Maintenance documentation in use and its completion
			2.27	Procedures for notification of maintenance data inaccuracies and ambiguities, to the type certificate holder
B.9	Records management and retention	CAO.A.035(e); CAO.A.040(d); CAO.A.050(b); CAO.A.060(j); CAO.A.075(a)/(b)(9); CAO.A.090; CAO.A.100(c);	2.13	Maintenance documentation in use and its completion
			2.14	Technical record control
			2.17	Records for the operator
			2.21	Control of computer maintenance record systems
			2.29	Airworthiness review procedures and records for ELA1 aircraft not involved in commercial operations
			L2.4	Line procedure for completion of technical log
			3.5	Certifying staff and support staff records
			4.2	Operator procedures and paperwork
			4.3	Operator record completion
			6	OPERATORS MAINTENANCE PROCEDURES
B.10	Reserved			
B.11	Reserved			
B.12	Reserved			
PART C – MAINTENANCE PROCEDURES				
C.1	Maintenance - general	CAO.A.025(10)	2.26*	Shift/task handover procedures
			3.12	Control of manufacturers' and other maintenance working teams

Chapter	Description	CAR reference	MOE chapter	MOE chapter description
C.2	Work order acceptance	CAO.A.055(b)	4.1	Contracting operators
			6	OPERATORS MAINTENANCE PROCEDURES
C.3	Components, equipment, tools and material (supply, acceptance, segregation, storage, calibration...)	CAO.A.050; CAO.A.060(d); CAO.A.030(b)	2.1	Supplier evaluation and subcontract control procedure
			2.2	Acceptance/inspection of aircraft components and material from outside contractors
			2.3	Storage, tagging and release of aircraft components and material to aircraft maintenance
			2.4	Acceptance of tools and equipment
			2.5	Calibration of tools and equipment
			2.19	Return of defective aircraft components to store
			2.20	Defective components to outside contractors
			L2.1	Line maintenance control of aircraft components, tools, equipment, etc.
			L2.5	Line procedure for pooled parts and loan parts
			L2.6	Line procedure for return of defective parts removed from aircraft
C.4	Maintenance facility (selection, organisation, cleanliness and environmental limitations)	CAO.A.060(b)/(e)/(f)	2.7	Cleanliness standards of maintenance facilities
C.5	Maintenance accomplishment and maintenance standards	CAO.A.095(a)(1); CAO.A.060(c); Appendix I points (b)/(c)/(d)	2.6	Use of tooling and equipment by staff (including alternate tools)
			2.9	Repair procedure
			2.10	Aircraft maintenance programme compliance
			2.11	Airworthiness directives procedure
			2.12	Optional modification procedure
			2.16	Release to service procedure
C.6	Prevention of maintenance error	CAO.A.060(g)/(i)	2.25	Procedures to detect and rectify maintenance errors.
C.7	Critical maintenance tasks and error-capturing method	CAO.A.060(h)	2.23	Critical maintenance tasks and error-capturing methods
			L2.7	Line procedure for critical maintenance tasks and error-capturing methods
C.8	Fabrication	CAO.A.020(c)		
C.9	Certifying staff responsibilities and maintenance release		2.11	Airworthiness directives procedure
			2.16	Release to service procedure

Chapter	Description	CAR reference	MOE chapter	MOE chapter description
		CAO.A.040(a); CAO.A.065; CAO.A.070; CAO.A.095(a)(4)	L2.4	Line procedure for completion of technical log
			4.2	Operator procedures and paperwork
			6	OPERATORS MAINTENANCE PROCEDURES
C.10	Defects arising during maintenance	CAO.A.075(b)(6)	2.15	Rectification of defects arising during base maintenance
			2.18	Reporting of defects to DGCA / operator / manufacturer
			L2.3	Line maintenance control of defects and repetitive defects
C.11	Maintenance away from approved location	CAO.A.095(a)(3)		
C.12	Procedure for component maintenance under aircraft or engine rating	Appendix I point (b)/(c)		
C.13	Procedure for maintenance on installed engine (or component) under engine (or component) rating	Appendix I point (c)/(d)		
C.14	Special procedures (specialised tasks, NDT, engine running...)	CAO.A.030(a); Appendix I point (e)	2.9	Repair procedure
			2.24	Reference to specific maintenance procedures such as - – Engine running procedures – Aircraft pressure run procedures – Aircraft towing procedures – Aircraft taxiing procedures
			L2.2	Line maintenance procedures related to servicing/fuelling/de- icing, including inspection for/removal of de-icing/anti-icing fluid residues, etc.
PART E – SUPPORTING DOCUMENTS				
E.1	Sample documents		5.1	Sample of documents
			2.13	Maintenance documentation in use and its completion
E.2	List of subcontracted organisations		5.2	List of Subcontractors as per 145.A.75(b)
E.3	List of organisation contracted by the CAO		5.4	List of contracted organisations as per 145.A.70(a)(16)
E.4	Aircraft technical log system (if applicable)			
E.5	Reserved			

Chapter	Description	CAR reference	MOE chapter	MOE chapter description
E.6	Copy of contracts for subcontracted continuing airworthiness tasks			

*: these elements are not explicitly required by CAR-CAO, but if associated procedures already exist in the organisation that transitions to CAR-CAO, it is recommended to integrate them in the CAE under the chapter indicated.

Appendix VII — Comparison CAE with CAR-MF MOM (small organisation)

Chapter	Description	CAR reference	MOM (small org. Chapter)	MOM (small org.) chapter description (Appendix IV to AMC M.A.604)
PART A – GENERAL DESCRIPTION				
A.1	Statement by accountable manager	CAO.A.025(a)(1); CAO.A.035(a)	Part A	Accountable manager statement
A.2	General presentation of the organisation	CAO.A.035(a); CAO.A.100(e)	Part B	Description — General presentation of the organisation
A.3	Description and location of the facilities	CAO.A.025(a)(9); CAO.A.030	Part B	Description — Organisation's scope of work — Identification of the level of work which can be performed at each facility. — General description of the facility
			Part E	Appendices — List of maintenance locations.
A.4	Scope of work	CAO.A.020(a); CAO.A.025(a)(2); CAO.A.095(c); Appendix I point (a)	Part B	Description — Organisation's scope of work
A.5	Exposition amendments and changes to the organisation	CAO.A.025(a)(11)/(c); CAO.A.105	Part A	Amendment procedure
			Part D	Working Procedures — Management of indirect approval of the manual
A.6	Reserved			
A.7	Management personnel	CAO.A.025(a)(3); CAO.A.035(b); CAO.A.100(a)	Part B	Description — Name and title of management personnel
A.8	Organisation chart	CAO.A.025(a)(4)	Part B	Description — Organisation chart
A.9	Manpower resources	CAO.A.035(d)	Part B	Description

Chapter	Description	CAR reference	MOM (small org. Chapter)	MOM (small org.) chapter description (Appendix IV to AMC M.A.604)
				– Personnel – Technical personnel (number, qualifications and experience) – Administrative personnel (number)
A.10	List of certifying staff	CAO.A.025(a)(5)	Part B	Description – Certifying staff and airworthiness review staff
A.11	Reserved			
A.12	Reserved			
A.13	Reserved			
PART B – GENERAL PROCEDURES				
B.1	Quality (or organisational review) system	CAO.A.100(a)/(b)/(d)/(e)) /(f)	Part C	General Procedures – Organisational review
B.2	Audit plan (or frequency and content of organisational review)	CAO.A.100(b)/(f)	Part C	General Procedures – Organisational review – Organisation, frequency, scope and content (including processing of authority's findings) – Planning and performance of the review
B.3	Monitoring of maintenance contracts	CAO.A.100(b)(2)		
B.4	Qualification, assessment and training of staff	CAO.A.035(c)/(d)/(e)/(f); CAO.A.040(a); CAO.A.060(a)	Part B	Description – Personnel – Technical personnel (number, qualifications and experience)
			Part C	General Procedures – Training
B.5	One-off certification authorisation	CAO.A.040(b)	Part C	General Procedures – One time authorisations
B.6	Limited certification authorisation	CAO.A.040(c)		

B.7	Subcontracting	CAO.A.095(a)(2)/(b)(3); CAO.A.100(f)	Part C	General Procedures — Training
-----	----------------	---	--------	----------------------------------

Chapter	Description	CAR reference	MOM (small org. Chapter)	MOM (small org.) chapter description (Appendix IV to AMC M.A.604)
B.8	Maintenance data and continuing airworthiness management data	CAO.A.055(a); CAO.A.080	Part C	General Procedures — Subcontracting of specialised services
B.9	Records management and retention	CAO.A.035(e); CAO.A.040(d); CAO.A.050(b); CAO.A.060(j); CAO.A.075(a)/(b)(9); CAO.A.090; CAO.A.100(c)	Part D	Working Procedures — Records
B.10	Reserved			
B.11	Reserved			
B.12	Reserved			
PART C – MAINTENANCE PROCEDURES				
C.1	Maintenance - general	CAO.A.025(10)	Part D	Working Procedures — Occurrence reporting
C.2	Work order acceptance	CAO.A.055(b)	Part D	Working Procedures — Work order acceptance — Preparation and issue of the work package — Control of the work order
C.3	Components, equipment, tools and material (supply, acceptance, segregation, storage, calibration...)	CAO.A.050; CAO.A.060(d); CAO.A.030(b)	Part B	Description — Tools, equipment and material
			Part D	Working Procedures — Logistics — Execution — Procedures for accepting components from stores including eligibility check

Chapter	Description	CAR reference	MOM (small org. Chapter)	MOM (small org.) chapter description (Appendix IV to AMC M.A.604)
				— Procedures for returning unserviceable components to stores
C.4	Maintenance facility (selection, organisation, cleanliness and environmental limitations)	CAO.A.060(b)/(e)/(f)		
C.5	Maintenance accomplishment and maintenance standards	CAO.A.095(a)(1); CAO.A.060(c); Appendix I points (b)/(c)/(d)	Part D	Working Procedures — Preparation and issue of the work package — Preparation of the planned work — Work package content (copy of forms, work cards, procedure for their use, distribution) — Responsibilities and signatures needed for the authorisation of the work — Execution
C.6	Prevention of maintenance error	CAO.A.060(g)/(i)		
C.7	Critical maintenance tasks and error-capturing method	CAO.A.060(h)		
C.8	Fabrication	CAO.A.020(c)		
C.9	Certifying staff responsibilities and maintenance release	CAO.A.040(a); CAO.A.065; CAO.A.070; CAO.A.095(a)(4)	Part D	Working Procedures — Release to Service – Certifying staff — Release to Service – Supervision — Release to Service – Certificate of release to service
C.10	Defects arising during maintenance	CAO.A.075(b)(6)		
C.11	Maintenance away from approved location	CAO.A.095(a)(3)		
C.12	Procedure for component maintenance under aircraft or engine rating	Appendix I point (b)/(c)		
C.13	Procedure for maintenance on installed engine (or component) under engine (or component) rating	Appendix I point (c)/(d)		
C.14	Special procedures (specialised tasks, NDT, engine running...)	CAO.A.030(a); Appendix I point (e)	Part D	Working Procedures — Special procedures
C.15	Reserved			
PART E – SUPPORTING DOCUMENTS				
E.1	Sample documents		Part E	Appendices

Chapter	Description	CAR reference	MOM (small org. Chapter)	MOM (small org.) chapter description (Appendix IV to AMC M.A.604)
				— Sample of all documents used
E.2	List of subcontracted organisations		Part E	Appendices — List of subcontracted specialised services
E.3	List of organisation contracted by the CAO		Part E	Appendices — List of Part-145 or M.A. Subpart F organisations
E.4	Aircraft technical log system (if applicable)			
E.5	Reserved			
E.6	Copy of contracts for subcontracted continuing airworthiness tasks			

Appendix VIII — Comparison CAE with CAR-MG CAME

Chapter	Description	CAR reference	CAME chapter	CAME description (Appendix V to AMC M.A.704)
PART A – GENERAL DESCRIPTION				
A.1	Statement by accountable manager	CAO.A.025(a)(1) ; CAO.A.035(a)	0.1	Corporate commitment by the accountable manager
A.2	General presentation of the organisation	CAO.A.035(a); CAO.A.100(e)	0.2	General information
A.3	Description and location of the facilities	CAO.A.025(a)(9); CAO.A.030	0.2	General information
A.4	Scope of work	CAO.A.020(a); CAO.A.025(a)(2); CAO.A.095(c); Appendix I point (a)	0.2(c)	General information - Scope of work — Aircraft managed
A.5	Exposition amendments and changes to the organisation	CAO.A.020(a)(1) & (2); CAO.A.025(a)(11)(c); CAO.A.105	0.5	Procedure to notify DGCA of changes to the organisation's activities/ approval/ location/ personnel
			0.6	Exposition amendment procedures
A.6	Reserved			
A.7	Management personnel	CAO.A.025(a)(3); CAO.A.035(b); CAO.A.100(a)	0.3	Management personnel
A.8	Organisation chart	CAO.A.025(a)(4)	0.4	Management organisation chart
A.9	Manpower resources	CAO.A.035(d)	0.3(e)(1)	Management personnel - Manpower resources
A.11	Reserved			
A.12	Reserved			
A.13	Reserved			
PART B – GENERAL PROCEDURES				

Chapter	Description	CAR reference	CAME chapter	CAME description (Appendix V to AMC M.A.704)
B.1	Quality (or organisational review) system	CAO.A.100(a)/(b)/(d)/(e)/(f)	2.1	Continuing airworthiness quality policy, plan and audit procedure
			2.2	Monitoring of continuing airworthiness management activities
			2.3	Monitoring of the effectiveness of the maintenance programme(s)
			2.4	Monitoring that all maintenance is carried out by an appropriate maintenance organisation
B.2	Audit plan (or frequency and content of organisational review)	CAO.A.100(b)/(f)	2.1	Continuing airworthiness quality policy, plan and audit procedure
B.3	Monitoring of maintenance contracts	CAO.A.100(b)(2)	2.5	Monitoring that all contracted maintenance is carried out in accordance with the contract, including subcontractors used by the maintenance contractor
B.4	Qualification, assessment and training of staff	CAO.A.035(c)/(d)/(e)/(f); CAO.A.040(a); CAO.A.060(a)	2.6	Quality audit personnel
			4.1	Airworthiness review staff
B.7	Subcontracting	CAO.A.095(a)(2)/(b)(3); CAO.A.100(f)	2.2	Monitoring of continuing airworthiness management activities
B.8	Maintenance data and continuing airworthiness management data	CAO.A.055(a); CAO.A.080		
B.9	Records management and retention	CAO.A.035(e); CAO.A.040(d); CAO.A.050(b); CAO.A.060(j); CAO.A.075(a)/(b)(9); CAO.A.090; CAO.A.100(c);	1.3	Time and continuing airworthiness records, responsibilities, retention and access
			4.2	Review of aircraft records
			4.7	Airworthiness review records, responsibilities, retention and access
			1.1	Aircraft continuing airworthiness record system utilisation
B.10	Reserved			

Chapter	Description	CAR reference	CAME chapter	CAME description (Appendix V to AMC M.A.704)
B.11	Reserved			
B.12	Reserved			
PART D – CONTINUING AIRWORTHINESS MANAGEMENT PROCEDURES				
D.1	Continuing airworthiness management - general	CAO.A.025(10); CAO.A.095(b)(1); CAO.A.075(a)/(b)(7)/(b)(9)	1.9	Engineering activity
D.2	MEL (and CDL) application	CAO.A.075(a)	1.1	Aircraft technical log utilisation and MEL application
D.3	AMP development, control and periodic review	CAO.A.075(a)/(b)(1)/(b)(2)	1.2	Aircraft maintenance programmes — development amendment and approval
			1.5	Analysis of the effectiveness of the maintenance programme(s)
			1.10	Reliability programmes
D.4	Airworthiness directives and other mandatory airworthiness requirements	CAO.A.075(a)/(b)(5)/(b)(8)	1.4	Accomplishment and control of airworthiness directives
D.5	Modifications and repairs	CAO.A.075(b)(3)	1.6 *	Non-mandatory modification embodiment policy
			1.7	Major repair and modification standards
D.6	Pre-flight inspection	CAO.A.075(a)	1.11	Pre-flight inspections
D.7	Defects	CAO.A.075(b)(6)	1.8	Defect reports
D.8	Establishment of contracts and work orders for the maintenance	CAO.A.075(a)/(b)(4)/(b)(7)	3.1	Maintenance contractor selection procedure
D.9	Coordination of maintenance activities	CAO.A.075(b)(8)	2.4	Monitoring that all maintenance is carried out by an appropriate maintenance organisation
			2.5	Monitoring that all contracted maintenance is carried out in accordance with the contract, including subcontractors used by the maintenance contractor
D.10	Mass and balance statement	CAO.A.075(a)/(b)(10)	1.12	Aircraft weighing
D.11	Reserved			

Chapter	Description	CAR reference	CAME chapter	CAME description (Appendix V to AMC M.A.704)
D.12	Reserved			
D.13	Maintenance check flights	CAO.A.075(a)	1.13	Check flight procedures
PART E – SUPPORTING DOCUMENTS				
E.1	Sample documents		5.1	Sample documents
E.2	List of subcontracted organisations		5.3	List of subcontractors as per M.A.711(a)(3)
E.3	List of organisation contracted by the CAO		5.4	List of contracted approved maintenance organisations
E.4	Aircraft technical log system (if applicable)		1.1	Aircraft technical log utilisation and MEL application
E.5	Reserved			
E.6	Copy of contracts for subcontracted continuing airworthiness tasks		5.5	Copy of contracts for subcontracted work (Appendix II to AMC M.A.711(a)(3))

*: these elements are not explicitly required by CAR-CAO, but if associated procedures/document already exist in the organisation that transitions to CAR-CAO, it is recommended to integrate them in the CAE under the chapter indicated.

Appendix IX — Amending CAME from CAR-MG to CAR-CAMO

The text of this appendix is arranged to show deleted text, new or amended text as shown below, to revise an existing CAR-MG exposition with the objective to show compliance with CAR-CAMO.

- deleted text is struck through;
- new or amended text is highlighted in blue.

Part 0	General organisation, safety policy and objectives
0.1	Safety policy, objectives and Corporate commitment by the accountable manager statement
0.2	General information and scope of work
0.3	Management personnel
0.4	Management organisation chart
0.5	Procedure for changes requiring prior approval to notify DGCA of changes to the organisation's activities/ approval/ location/ personnel
0.6	Procedure for changes not requiring prior approval Exposition amendment procedures
0.7	Reserved
Part 1	Continuing airworthiness management procedures
1.1a	Use of aircraft continuing airworthiness record system and if applicable, aircraft technical log (ATL) system utilisation and MEL application Aircraft continuing airworthiness record system utilisation-
1.1b	MEL application
1.2	Aircraft maintenance programmes (AMP) — development amendment and approval
1.3	Time and Continuing airworthiness records, responsibilities, retention and access
1.4	Accomplishment and control of airworthiness directives
1.5	Analysis of the effectiveness of the maintenance programme(s)
1.6	Non-mandatory modification and inspections embodiment policy
1.7	Major Repairs s and modifications s standards-
1.8	Defect reports
1.9	Engineering activity
1.10	Reliability programmes
1.11	Pre-flight inspections
1.12	Aircraft weighing
1.13	Maintenance check flight procedures
Part 2	Quality system Management system procedures
2.1	Hazard identification and safety risk management schemes
2.2	Internal safety reporting and investigations
2.3	Safety action planning
2.4	Safety performance monitoring
2.5	Change management

2.6	Safety training and promotion
2.7	Immediate safety action and coordination with operator's emergency response plan (ERP)
2.8	Compliance monitoring
2.8.1	Continuing airworthiness quality policy, Audit plan and audit procedure
2.8.2	Monitoring of continuing airworthiness management activities
2.8.3	Monitoring of the effectiveness of the maintenance programme(s)
2.8.4	Monitoring that all maintenance is carried out by an appropriate maintenance organisation
2.8.5	Monitoring that all contracted maintenance is carried out in accordance with the contract, including subcontractors used by the maintenance contractor
2.8.6	Compliance monitoring Quality audit personnel
2.9	Control of personnel competency
2.10	Management system record-keeping
2.11	Occurrence reporting
Part 3	Contracted maintenance — management of maintenance
3.1	Maintenance contractor selection procedure
3.2	Quality Product audit of aircraft
Part 4	Airworthiness review procedures
4.1	Airworthiness review staff
4.2	Documented review of aircraft records
4.3	Physical survey
4.4	Additional procedures for recommendations to DGCA for the import of aircraft
4.5	ARC Recommendations to DGCA for the issue of ARC
4.6	Issue of ARC
4.7	Airworthiness review records, responsibilities, retention and access
4.8	ARC extension
Part 4B	Special flight permit procedures
4B.1	Conformity with approved flight conditions
4B.2	Issue of the special flight permit
4B.3	Reserved
4B.4	Interface with the DGCA for the flight
4B.5	Special Flight permit records, responsibilities, retention and access.
Part 5	Appendices Supporting documents
5.1	Sample documents, including the template of the ATL system
5.2	List of airworthiness review staff
5.3	List of subcontractors as per point M.A.711(a)(3) CAMO.A.125(d)(3)
5.4	List of contracted approved maintenance organisations and list of maintenance contracts as per point CAMO.A.300(a)(13)

5.5	Copy of contracts for subcontracted work (Appendix II to AMC1 CAMO.A.125(d)(3) AMC M.A.711(a)(3))
5.6	List of approved maintenance programme as per CAMO.A.300(a)(12)
5.7	Reserved