



# UPDATE

June, 2005

Last *Update*: March, 2004

[www.caadmo.ca](http://www.caadmo.ca)

## ***AWM563, Distribution of Aeronautical Products***

NPA's were reviewed and approved by CARAC Part V Technical Committee in November, 2003. They're currently working their way through TC's Legal Department and should hit Gazette I "soon". (And hopefully we'll still recognize them.)

## ***Recertification of Undocumented Parts (Std 571, Appendix H)***

As some of you are aware, this has become a somewhat contentious issue. TC have, after approving a few "select" AMO's, taken these regs back to the drawing board and are working on new NPA's to modify the procedures to satisfy some concerns that came from the TC Regions. That the original Working Group (which included CAADMO) wasn't consulted prior to this decision is quite frustrating. TC can't give us an answer as to when we might see the new NPA's, but we'll certainly be keeping the pressure on them.

## ***Fatigue Risk Management Systems***

The latest CARAC meeting on this subject was held on May 31/05 in Gatineau, QC. The meeting went fairly well and I'm happy to report that Fatigue Risk Management Systems is no more. Industry was able to convince TC that a separate "system" was NOT required and that FRM should be dealt with from within the overall Safety Management System (SMS). However, the SMS requirements (to be introduced in 573.16) have been modified, at TC's insistence, to add extra emphasis to the risks presented by Fatigue. Most of industry groups represented at the meeting disagreed with the prominence and emphasis that TC have granted to Fatigue within SMS, but what we got was perceived as the best compromise. The modified NPA's (2004-47 & -49) are attached for your perusal. We're not sure what these will look like when TC's Legal Department are through with them and it should be noted that both ATAC and CUPE indicated that they might be filing Dissents. We shall see.

We were also given a briefing by Dr. Drew Dawson, TC's "subject matter expert" (from Australia). Dr. Dawson was to unveil TC's "FRM Assessment Toolbox" and I confess to feeling more comfortable about FRM within SMS as a result. If your local PRM receives the same briefing that we did (admittedly a big "if") FRM might not be too bad. We'll circulate this material as it becomes readily available.

## CAADMO “Update” (Jun/05), Continued...

### *Safety Management Systems*

As noted above, the SMS NPA’s are now complete (subject to Dissents and Legal rewording). It is TC’s “vision that SMS will be implemented in all regulated civil aviation organizations by 2007”. Their implementation intentions can be reviewed at <http://www.tc.gc.ca/civilaviation/sms/implementation.htm>. Obviously, this schedule depends on the speed with which documentation moves through TC and through Parliament. Given the Minister’s desire to get this set-up, don’t be surprised it this stuff moves pretty quickly.

In preparation, you might take a look at some TC documents that you can download from their website... TP13739 Introduction to SMS; TP13881 SMS for Flight Operations and Aircraft Maintenance Organizations; TP14135 SMS for Small Aviation Operators; TP14326 SMS Assessment Guide; TP14343 SMS Implementation Procedures Guide (for Air Operators & AMOs). These documents give you a “flavour” of what SMS is all about, though the guidance material and literature is slanted toward companies that are maintaining aircraft. It’s hard to equate the “Specialized Services AMO” to this documentation. Take note that CAADMO has volunteered to be part of a pilot project whose objective is “to determine the appropriateness of the proposed regulations on SMS for small companies; to evaluate the tools and guidance material on SMS; and to assist TC in developing a practical implementation plan for SMS”. We haven’t heard when this might commence... presumably “soon”.

### *Membership/What’s New*

We’ve had a number of new members join since the last *Update*. A full, current membership listing is attached. If you’re aware of any AMO’s that seem despondent that no one is representing them versus TC, please send them our way.

As always, if anyone has any questions, comments, or concerns that you’d like to discuss, don’t hesitate to contact us.

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