



Civil Aviation Safety Authority
of Papua New Guinea

Advisory Circular

AC144-1

Supply Organisations - Certification

Issue 1
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GENERAL

Civil Aviation Safety Authority Advisory Circulars (AC) contain information about standards, practices and procedures that the Director has found to be an Acceptable Means of Compliance (AMC) with the associated rule.

An AMC is not intended to be the only means of compliance with a rule, and consideration will be given to other methods of compliance that may be presented to the Director. When new standards, practices or procedures are found to be acceptable, they will be added to the appropriate Advisory Circular.

This Advisory Circular also includes Explanatory Material (EM) where it has been shown that further explanation is required. Explanatory Material must not be regarded as an acceptable means of compliance.

PURPOSE

This Advisory Circular provides methods, acceptable to the Director, for showing compliance with the supply organisation certificate requirements of Rule Part 144 and explanatory material to assist in showing compliance.

RELATED CAR

This AC relates specifically to Civil Aviation Rule Parts 144

CHANGE NOTICE

This AC replaces Initial Issue dated 1 July 2002.

APPROVAL

This AC has been approved for publication by the Director of Civil Aviation.

TABLE OF CONTENTS

Subpart A - General	3
EM 144.1 Purpose.....	3
EM 144.3 Definitions	3
EM 144.5 Requirement for Certificate.....	3
EM 144.7 Application for Certificate	3
EM 144.9 Issue of Certificate	4
EM 144.11 Privileges of Certificate Holder	4
EM 144.13 Duration of certificate	5
EM 144.15 Notification of ceasing supply	5
EM 144.17 Renewal of certificate.....	5
Subpart B – Acceptance of Foreign Design Organisations	6
EM 144.51 Purpose.....	6
EM 144.53 Acceptable Foreign Certificates.....	6
Subpart C – Certification Requirements	7
EM 144.101 Purpose	7
EM 144.103 General.....	7
EM 144.105 Personnel Requirements	7
EM 144.107 Facility Requirements	10
EM 144.109 Supply Control Procedures	10
EM 144.111 Records	11
EM 144.113 Internal Quality Assurance.....	12
EM 144.115 Supply Organisation Exposition	13
EM 144.112 Internal Safety Management Requirements	14
Subpart D – Operating Requirements	15
EM 144.201 Continued Compliance.....	15
EM 144.203 Changes to Certificate Holder’s Organisation	15
EM 144.205 Safety Audit and Inspections	15

Subpart A - General

EM 144.1 Purpose

The purpose of Part 144 is to prescribe the certification requirements for organisations wishing to supply or distribute for use on PNG registered aircraft, aeronautical products, materials or items of equipment for which release notes are required to be issued.

There is no aeronautical supply capability domiciled in PNG and therefore, organisations who supply or distribute products, materials or items of equipment in respect of PNG registered aircraft are located offshore and undertake such work in accordance with approvals granted by other regulatory authorities.

Part 144 is therefore structured to accept or validate the supply or distribution organisation approvals granted by Contracting States. Subpart B provides for the Director's acceptance of a supply or distribution organisation approval issued by a Contracting State on the basis of known equivalence. Subpart C provides for certification of a foreign supply or distribution organisation where the standards for foreign certification are either unknown or are known to differ from PNG.

*For the purposes of this AC, the word **supply** should be taken to mean **supply or distribution**.*

EM 144.3 Definitions

The definitions shown in this rule are specific to Part 144. Definitions associated with more than one Part are contained in Part 1.

EM 144.5 Requirement for Certificate

This rule requires a supply organisation certificate for the supply or distribution of any of the following—:

- an aeronautical product broken from a batch of aeronautical products conforming to airworthiness standards acceptable to the Director; or
- an aeronautical product, material or item of equipment whose design requires it to be held under specially controlled storage conditions to ensure that the product continues to conform to airworthiness standards acceptable to the Director; or
- an aeronautical product, material or item of equipment that, in the absence of documentation specified in 144.109(a)(3)(ii), requires inspection or testing to determine its conformity to airworthiness standards acceptable to the Director.

A supply organisation certificate is not required where a maintenance organisation provides another maintenance organisation or an operator with a product, part or material from their store on a repayment or restock basis provided the product, part or material is accompanied by original release documentation and no batches have been broken.

EM 144.7 Application for Certificate

The application form CA 144/01 must be completed in full and must identify the full extent of the intended supply activity. This information will be used in determining the ratings to be issued under 144.11 and the assessment and preparation of any limitations associated with the certificate.

Form CA 144/01 can be downloaded from the CASA website.

The applicant should submit the application not less than 120 working days before the date of intended commencement of activity. For applicants that apply without giving 120-day notice the CASA may not be able to offer any confirmation that the organisation will be certificated in time to meet the applicant's deadline.

Applicants should plan their certification programme in advance and early consultation with the CASA will

ensure all issues are dealt with well before the planned start-up date. Having said this, the time involved for certification is dependent on the quality and completeness of the application and exposition.

EM 144.9 Issue of Certificate

There are several requirements to be met for the issue of the certificate. Primarily, the applicant must meet the requirements of Subpart B or Subpart C of the Part to be issued a certificate.

CASA implements a 5-phase certification process as follows:

Phase 1 PRE-APPLICATION: The applicant writes a letter of intent (LOI) to the Director stating their strategic intent to hold a Part 144 approval. The LOI is normally submitted together with risk assessment and change management plans. The Director will respond to the LOI by either requiring further information from the applicant or allowing them to proceed to the next phase 2.

Phase 2 FORMAL APPLICATION: The applicant submits application form CA 144/01 and pays the required application fees. CASA will meet with the applicant to discuss and agree on a schedule of events (SOE) for the project.

Phase 3 DOCUMENT EVALUATION: To be assessed as meeting the requirements of Part 144 the applicant's documentation will be checked for compliance with the rules and suitability for the type of supply tasks the applicant is proposing to carry out.

Phase 4 ENTRY INSPECTION: After the documentation is accepted as satisfactory, an entry inspection of the applicant's facilities and resources will be made and will normally include interviews with key staff members.

Phase 5 CERTIFICATION: Once CASA is satisfied with the organisation and the applicant's nominated senior persons have been assessed fit and proper as required, a certificate will normally be issued for a limited period on completion of which, a full compliance audit will be conducted before full certification is given. The length of the initial induction period will depend on the type of maintenance work proposed, the adequacy of resources, and the experience of the applicant and their staff.

To be assessed as meeting the requirements of Subpart B, the applicant will need to provide a copy of the foreign supply organisation's certificate and exposition, and details of the senior persons who will be responsible for liaison with the PNG CASA on supply matters. The documentation will be assessed for acceptance and the suitability of the persons nominated for liaison with PNG confirmed.

To be assessed as meeting the requirements of Subpart C the applicant's documentation will be checked for compliance with the rules and suitability for the type of supply activity the applicant is proposing to carry out. After the documentation is accepted as satisfactory, an entry inspection of the applicant's facilities and resources will be made and will normally include interviews with key staff members.

Once the CASA is satisfied with the organisation and the applicant's nominated senior persons have been assessed as fit and proper as required by the Act, the certificate is issued. A certificate will normally be issued for a limited period on completion of which, a full compliance audit will be conducted before full certification is given. The length of the initial induction period will depend on the type of supply activity proposed, the adequacy of resources, and the experience of the applicant and their staff.

The Director may prescribe limitations and conditions on a supply organisation certificate.

EM 144.11 Privileges of Certificate Holder

The holder of a supply organisation certificate may—

- supply and issue release notes for aircraft parts (rating S1)
- supply and issue a release note for aeronautical materials (rating S2)
- supply and issue a release note for specialised services equipment and tooling (rating S3).

- Supply and issue of release notes for fluids (rating S4).

Whilst the ratings are general abilities, the detailed capability of an organisation should be stated in its exposition. This detailed capability will largely be dependent on the facilities the organisation has access to and the experience of the personnel the organisation employs. An applicant should not detail activities the organisation will not be able to provide.

EM 144.13 Duration of certificate

The initial issue of a certificate will normally be for a period of six months to enable the organisation to demonstrate compliance with their exposition and Part 144. Prior to the expiry of the initial certificate, the CASA will conduct a full compliance inspection of the organisation and, if satisfactory, a longer duration certificate, up to five years, will be issued.

The initial compliance audit should ensure that the organisation is complying with their exposition and that the exposition accurately reflects the organisation's activities. Future audits will examine similar compliance requirements and any other relevant matters.

Certificates which expire, or are revoked, must be returned immediately to the CASA Airworthiness Authority. Suspended certificates should also be forwarded immediately to the CASA for endorsement.

EM 144.15 Notification of ceasing supply

If an organisation decides to cease supply activity, this rule requires the certificate holder to notify the CASA. A letter should be sent to the CASA Airworthiness Authority, together with the certificate, within 30 days of ceasing activity.

This rule ensures the CASA has an accurate picture of the supply organisations supporting aircraft in Papua New Guinea.

EM 144.17 Renewal of certificate

The rule specifies a period of 30 days before the certificate expires for application for renewal. The certificate holder should make provision for this in the exposition. The renewal of a supply organisation certificate may be delayed if the organisation's application is not forwarded with the required lead-time.

An organisation should allow sufficient time for the renewal process to be planned and carried out. The time involved will vary according to the type of supply activity the organisation is certificated for and carrying out, as well as the period the certification has been in force.

Where a certificate has been in force for the full five years, a re-entry application and audit process will be required to be followed. This process will ensure that all facets of the organisation comply with Part 144 and the latest revision of its exposition. The extent of this re-entry process will depend on the organisation's conduct to date, any changed circumstances, and results of safety audit findings over the period of validity.

Subpart B – Acceptance of Foreign Design Organisations

EM 144.51 Purpose

This purpose of this Subpart is to provide a mechanism for the CASA to recognise acceptable foreign supply organisation certificates as an alternative to organisations holding such certificates having to go through the full compliance process detailed in Subpart C.

EM 144.53 Acceptable Foreign Certificates

This rule lists those authorities which the CASA has determined issue supply organisation certificates to the same standards as are prescribed in Subpart C. Where the certification processes for supply organisations in other countries are either known to be different (e.g. in the USA and UK) or are unknown, an applicant is not eligible for certification under this rule. Applications will be assessed on a case by case basis and if the foreign authority certification process is shown to be equivalent to this Part 144, that authority will be added to the list in 144.53.

An applicant seeking to have a certificate issued by one of these authorities accepted for the purpose of gaining PNG certification under Part 144, is only required to provide the CASA with a copy of the foreign supply organisation certificate and the associated exposition, together with the names of the senior persons in that organisation who will liaise with the CASA on matters relating to PNG.

The rule does allow the CASA to verify the conditions of continuing validity of the foreign organisation certificate and to impose any conditions and limitations of the PNG certificate.

Subpart C – Certification Requirements

EM 144.101 Purpose

This Subpart details the certification requirements to be met by an organisation which is not eligible for certification under Subpart B. A foreign supply organisation currently holding a certificate issued by an authority other than one of those listed in 144.53, or and a PNG organisation seeking approval as a supply organisation, must meet the requirements of this Subpart.

EM 144.103 General

This rule recognises that an applicant may have an exposition which could either be shown to meet all the requirements of Subpart C or which otherwise could be supplemented to address the Subpart requirements not considered to be met. An applicant would only be required to produce a complete exposition specifically for PNG certification if neither of the previous conditions could be met.

EM 144.105 Personnel Requirements

An applicant must identify their Chief Executive and other key personnel. The applicant's nominated senior persons must be employed, contracted or otherwise engaged to work sufficient hours such that the individual can fulfil the management functions associated with the size and scope of the applicant's business.

The rule identifies what are considered the critical members of an organisation who will exercise an appropriate level of control, direction, and responsibility, to ensure the continued effectiveness of the activity undertaken. Further, the applicant must have in their exposition an organisation chart showing the lines of responsibility extending from the CEO through to each location where supply staff are located.

An applicant may utilise any organisational structure as part of their overall business structure provided the applicant can satisfy the Director as to the effectiveness of the reporting lines and control required to be exercised. Applicants should note that approval of alternative organisation structures is not automatic.

144.105(a)(1)

The intent of the rule regarding the responsibility and authority of the Chief Executive is to ensure that:–

- the supply activities carried out by the organisation can be financed
- those activities are carried out in accordance with Part 144
- the organisation complies with the requirements of Part 144.

It is clear that this person needs to have the authority to ensure the activities of the organisation can be financed. A suggested method of demonstrating this could be by presenting an annual business forecast, or have as a part of compliance with rule 144.115(a)(3), the authority to finance the operation clearly defined as part of the Chief Executive responsibilities.

The Chief Executive must assure that the exposition complies with the rules. The exposition amendment procedures should cover this.

The Chief Executive must also be assured that supply activity is conducted in compliance with the exposition. Ensuring compliance with the exposition is the responsibility of the senior persons under rule 144.105(a)(2) and the assurance that the Chief Executive requires could be shown through the medium of the internal audit reports or inspections.

This person will need to demonstrate during initial application and at any other time, that they have the knowledge to control the organisation.

If an organisation has several independent business units then it may be appropriate to apply for certification independently. If this is the case, a Chief Executive will be required to be identified for the supply unit

specifically.

If, on the other hand, an organisation retains one identity the Chief Executive should be clearly shown to have an appropriate level of authority. This may occur where an organisation is certificated for other tasks such as maintenance or manufacturing and only one core exposition is used for all administrative functions.

146.105(a)(2)

Under this rule, the organisation must appoint senior persons responsible to the Chief Executive for —

- aeronautical product, material or equipment acceptance
- inspection and testing
- dispatch of products, material or equipment and issue of the associated release documents
- internal quality assurance.

Titles may vary between organisations but the requirements are for management representatives for acceptance, inspection and testing, dispatch and document issue, and internal quality assurance.

In smaller organisations, the Chief Executive and the senior persons may be the same individual but in all cases, there should be clear definitions of the position's responsibilities. The individual undertaking one or more functions in the organisation should have a clear understanding of the division of the responsibilities and be able to show this to the CASA. Some functions should not be combined as they conflict with responsibilities assigned to the intended positions, for example, the functions of Chief Executive and Quality Assurance.

The person or persons nominated will represent the management structure of the organisation and are required to be acceptable to the Director.

The senior persons should be responsible for ensuring that—

Product, material or equipment acceptance

- products, materials or equipment are accepted into the organisation in a systematic manner
- all incoming documentation is cross-checked with the incoming item and filed
- items requiring physical inspection for conformity are forwarded to the Inspection and Test area
- any corrective action relating to the supply control system resulting from the internal quality assurance programme is quickly and effectively carried out

Inspection and testing

- any inspections and tests carried out are implemented and running effectively
- inspections and tests reflect the current state of the art of the aviation industry and provide the results necessary to show compliance with airworthiness requirements
- any corrective action relating to the inspection and testing resulting from the internal quality assurance programme is quickly and effectively carried out

Internal quality assurance

- the organisation remains in compliance with Part 144
- the exposition and the associated procedures remain adequate for the scope of the organisation's activities

- any exemptions required are processed in accordance with the organisation's procedures and Part 11
- personnel meet the initial and on-going training and qualification criteria defined in the exposition
- staff are authorised appropriately for performing certifications on behalf of the organisation
- support systems are effective in providing for the activities of any internal quality assurance personnel
- any corrective action relating to the exposition, procedures, qualifications, personnel, or support systems resulting from the internal quality assurance programme is quickly and effectively carried out

146.105(a)(3)

Under this rule, the organisation's personnel levels should ensure that a sufficient number of suitably qualified people are available to carry out the supply task.

146.105(b)

The competence of all staff should be determined on the basis of—

- academic qualifications
- licences, certificates or approvals held
- employment records
- written, oral, or practical examination.

The organisation should provide for the assessment and maintenance of the levels of competency of all personnel.

At the time of application, the applicant must consider how they will deal with transfer of the senior person functions, to other suitable and qualified persons during periods of absence. Although the rule does not make provision for or have any requirement for the situation where a senior person may be absent for a prolonged period of time, or vacates the position it is advisable to provide for this in advance. Consideration should also be given to a situation where a senior person has been incapacitated. This would in effect cause the position to be vacant for the period of incapacitation and would require a substitute person to meet the requirements of this Part. In the event that the responsibilities and functions are transferred to another person they would also be required to be fit and proper, and meet the experience and qualifications set out in the exposition.

In the event an applicant chooses not to provide for the situation where a senior nominated person vacates a position, it should be remembered that the Director has to be notified of such a situation and the certificate holder will also be called to provide details of the contingency arrangements to be implemented pending a permanent solution being achieved.

It should be noted that where a change of senior person is proposed, rule 144.203(b)(2) requires the prior notification of the change and acceptance by the Director.

In accepting such contingency arrangements, the Director may impose limitations or conditions of a temporary nature for the period of the contingency. The conditions or limitations imposed by the Director in all cases will be clearly stated to the certificate holder in writing, and could be as simple as providing a time frame for events to take place or a total suspension of supply activity.

EM 144.107 Facility Requirements

Office accommodation should provide for the management, planning, records, quality, inspection and receipt/dispatch staff. The offices should be sufficient to meet the requirements for the scope of supply activity to be undertaken.

As there is an ongoing requirement to retain supply records, the provision of storage and the methods of cataloguing and preventing deterioration of this material is required.

The supply organisation's arrangement of areas should provide—

- for the segregation of receipt and dispatch operations
- for a dedicated inspection function and be equipped with appropriate inspection equipment
- storage facilities, including any special environmental features
- a dispatch area with adjacent facilities for preparation of release documentation.

EM 144.109 Supply Control Procedures

This rule details the process control elements of a supply organisation. These elements ensure that conformity is assured at each step of supply. Process control includes provisions for—

- inwards receipt
- inspection and testing
- storage control, including segregation of conforming and non-conforming products
- issue of the CA Form Two
- defect reporting

Inwards receipt

The holder of a supply organisation certificate is responsible for determining the correct description of any aeronautical product, material or item of equipment received into the organisation. Scrutiny of data plate information, labelling, and accompanying documentation and cross referencing this to manufacturer's data, standards or specifications should provide an accurate description of product or material being received. This process step provides the basis for establishing conformity.

Inspection and testing

Each product, material or item of equipment must be physically inspected in detail to confirm that it is what it purports to be, that accompanying release documentation is valid and that the product, material or item of equipment is fit for use.

Where there is any doubt about the conformity of a product, material or item of equipment, through either its condition or the state of the accompanying release documentation, the supply organisation may obtain the services of a Part 145 certificated maintenance organisation to test the product, material or item of equipment. In the case of aeronautical components, the Part 145 organisation would normally be approved to overhaul the type of component.

The supply organisation procedures should require an external organisation testing any product, material or item of equipment, to certify a statement of conformity.

Storage control

The supply organisation must establish procedures to ensure segregated storage of conforming and non-

conforming products, material or items of equipment. Storage arrangements and practices must prevent deterioration and damage to products and materials.

Detailed information on storage requirements is contained in AC20-1.

Issue of CA Form Two

The purpose of the CA Form Two is to provide certification of conformity for a product, material or item of equipment where that product, material or item of equipment is not supported by an original authorised release certificate.

The supply organisation's procedures need to address the issue of a CA Form Two in cases where—

- products, material or items of equipment are broken out and supplied from a batch received into the supply organisation on a single authorised release certificate; or
- the authorised release certificate accompanying a product, material or item of equipment was invalid and it was necessary to re-establish conformity by testing in a Part 145 certificated maintenance organisation.

Defect reporting

The supply organisation should document procedures for reporting defect information found during inwards inspection of products, materials and items of equipment. Particular attention needs to be given to reporting any bogus items received.

EM 144.111 Records

Supply records

The holder of a supply certificate should provide procedures that ensure—

- a record is kept of all products, material and items of equipment supplied by the organisation; and
- copies of all release notes issued by the organisation and copies of all original authorised release certificates received are retained; and
- a record is kept of all deficiencies found during inwards inspection of products, material and items of equipment; and
- a record is kept that any special storage facility is functioning within specification.

Records should be legible and of a permanent nature.

Records can be kept electronically but systems should ensure the information security, integrity, and retrieval. A system of backing up electronic data would be considered appropriate. Procedures for electronic record and document keeping should consider—

- avoidance of data loss in the event of power interruptions
- software control, including amendments and prevention of corruption
- unauthorised access
- audit trail facilities
- archiving of data in a similar manner to hard copies, and for a similar period

- backup of critical information, preferably once a day, with storage for that backup information
- data verification, on entry and retrieval
- publication provision
- staff training
- amendment of stored data
- problem report register including the problem details and solutions

The rule requires retention of records to be 5 years from the date each individual record was raised.

Personnel records

A certificated supply organisation must establish procedures to ensure records are kept of all staff authorised to certify under its authority. The following minimum information should be kept in respect of each certifying person—

- name
- date of birth
- qualifications
- initial training
- continuation training
- experience
- qualifications relevant to the authorisation
- privileges of the authorisation
- date of first issue of the authorisation
- the expiry date of the authorisation
- identification number of the authorisation

The records may be kept in any format but must be controlled by the organisation's quality assurance senior person. Safeguards must be put in place to ensure that the records cannot be altered in an unauthorised way. Personal information must not be accessible to unauthorised persons. Organisations should take account of Privacy of Information legislation in the management of personal information.

The persons to whom the records relate should be given access, on request, to his or her own records. The CASA is an authorised person in respect of any aviation documents and records. When the CASA is assessing eligibility for initial or continued approval, or when it has cause to doubt the competence of a particular certifying person, it may access those records.

An organisation should keep the records for at least five years after the individual has ceased to be in its employment, or after withdrawal of the authorisation, whichever is sooner. In addition, certifying persons, on leaving an organisation, must be provided with a complete record of company certification authorisations which they have held.

EM 144.113 Internal Quality Assurance

An applicant must establish an internal quality assurance system that meets the requirements of this rule.

The requirements of this rule are common to all certificated organisations which require an internal quality assurance system, for example all the organisations to which the 140 series and 170 series Parts apply.

Detailed information on what is required for an internal quality assurance system is contained in PNG AC 10-1.

EM 144.115 Supply Organisation Exposition

This rule requires an applicant for a supply organisation certificate to establish an exposition.

The purpose of an exposition is to express the Chief Executive's requirements for the conduct of the organisation and sets out the means by which an organisation defines its operation, and shows both its employees and the CASA how it will conduct its day-to-day business in compliance with Part 144.

An exposition must assure the CASA that the organisation is in documentary compliance with the rule. Hence before the CASA grants an organisation entry into the system, the exposition must be accepted by the Director.

Makeup of exposition

An exposition may be produced as a single volume or any number of separate manuals Depending on an organisation's structure and size, separate manuals could cover—

- Management and Policy
- Personnel
- Supply Procedures
- Document Control
- Quality Assurance
- Contractual Arrangements with inspection and testing organisations.

If the exposition comprises more than one volume, the make up of the exposition and the content of individual manuals must be described in the management part of the exposition.

Procedures should be established to ensure Managers hold copies of those parts of an exposition which affect their areas of responsibility and staff are familiar with those parts of an exposition which affect their area of employment.

Content

The exposition should be constructed to address each element of 144.115. The structure should reflect the hierarchy of Part 144 such that the exposition progressively moves from higher level organisational material such as policy, scope of approval, and duties of senior persons to more detailed procedures.

Structuring the exposition according to the flow of the rules in Part 144 should be avoided, the result will not be a user friendly document.

The level of detail should be consistent with the size and complexity of the organisation and the design activity undertaken.

EM 144.112 Internal Safety Management Requirements

An applicant for the grant of a supply organization certificate must establish and implement a safety management system to systematically manage safety through a continuing process of hazard identification and risk management as required by Rule 100 Subpart B.

Subpart D – Operating Requirements

EM 144.201 Continued Compliance

To ensure that all members of the organisation have access to the exposition, a certificated organisation is required to provide copies of its exposition at all places where work is normally carried out.

For continued compliance with the conditions of its Part 144 certificate, the organisation must comply with all the procedures detailed in the exposition and continue to meet the standards and conditions, which were required for initial certification.

In the case of organisations accepted under Subpart B for issue of a PNG supply certificate, that organisation's foreign certificate must remain valid. If that foreign certificate is suspended, revoked or cancelled, the organisation's PNG certificate will be suspended, revoked or cancelled.

EM 144.203 Changes to Certificate Holder's Organisation

An organisation should always ensure that its exposition remains an accurate description of the organisation and its activities. When there are changes to staff, structure, location, or documented procedures the organisation should ensure the exposition reflects these changes.

Prior acceptance by the Director is required for certain changes including—

- the Chief Executive
- the listed senior persons
- the scope of products, materials or items of equipment the holder is authorised to supply
- the locations at which supply activity is carried out.

Organisational changes

When the holder of a supply certificate changes their organisation in such a way as to necessitate a revision of their manuals or exposition, the CASA is to be kept informed. An acceptable means of compliance with the notification requirements is to notify the CASA in writing of any changes. A facsimile message may be accepted as a notice in writing.

The CAA's agreement to the change may be more readily obtained if the proposed wording of the change is fully defined and any supplementary information is provided to assist the CASA in deciding whether the change is acceptable.

Supply certificate amendments

An application to amend a supply certificate is made in the same form and manner as the original issue. Where the changes include changes to the supply organisation's exposition, only the changes need be submitted.

EM 144.205 Safety Audit and Inspections

The organisation must also comply with any reasonable requests from the Director to undergo audits and inspections. The Director is empowered by the Civil Aviation Act to make such requests.

The CASA operates a safety audit programme for all participants in the aviation system. For supply organisations the safety audit will be part of the total industry safety monitoring schedule and visits will be notified in advance. These arrangements will allow for forward planning by both the CASA and the certificated organisations.

An organisation's policy and procedures will be accepted by the CASA during the entry process. These policies and procedures, documented in an organisation's exposition, will form the agreed performance standard for an organisation's safety audit programme. This safety audit programme will initially examine the certificate holder's internal quality assurance system. Any deficiency found at this level will result in a broader and deeper investigation until the causal factors of the deficiency are identified. The on-going frequency and depth of audit will depend directly on the performance of the organisation.

The CASA's level of confidence in an organisation will be raised when it is found to comply with its documented procedures. The CASA can then consider reducing the frequency and depth of the audit programme, with consequent financial savings for the organisation. Conversely where the level of confidence is low, due to non-compliance, the level of auditing and the consequent cost to an organisation may be expected to increase. Whenever it is discovered, through an audit or other reporting method, that an organisation is not conforming with its procedures, or complying with the Part 144 rules, the Director may suspend or revoke the certificate.