SAFETY ALERT 2018-13
Issue 01
Date of Issue: 21st October 2018

SUBJECT:
MAINTENANCE ORGANISATION REVIEW SCHEME (MORC)

REFERENCE PUBLICATIONS:
MORC SCHEME POLICY CLARIFICATIONS

REASON:

The MORC Scheme has been implemented since January 2017. As per APPENDIX IX to CAR-145, the GCAA may accept the submission of a MORC Report as a means to a certification audit by the GCAA during the initial issuance and extension of an AMO Approval Certificate. However, APPENDIX IX to CAR-145 does not clearly state the policy used by the GCAA to allow an application to be evaluated under MORC Scheme.

This Safety Alert is issued to:
a) clarify the policy used by the GCAA to the organisations holding the MORC privileges to allow an AMO application to be evaluated under MORC Scheme;
b) clarify the GCAA’s role under scheme;

Note: The elements of this policy are in line with the resolution adopted by the MORC Technical Committee on 15 Feb 2018 and will be incorporated into APPENDIX IX to CAR 145 at the next opportunity.

RECOMMENDATIONS:

Recommendation No. 1:
Organisations holding MORC privilege should ensure that their system complies with the following policy:
a) The contracted foreign maintenance organisation (FAMO) must hold a valid GCAA CAR-145 AMO approval certificate
   NOTE: Currently, the Revised MORC Policy is not applicable for initial issuance of a CAR-145 AMO approval certificate.
b) The scope of works sought by the contracted maintenance organisation is limited to Line Maintenance activities.
c) The required scope of works is already approved by EASA either by the grant of an EASA PART-145 Approval Certificate or an approval via the FAA-EASA Bilateral Agreement.
d) The organisation holding the MORC privilege must assign a MORC-Authorised Staff (AS) to conduct a compliance review of the contracted maintenance organization’s scope of work, capability and current foreign approval held as prescribed by MORC Regulation CAR 145.106 to demonstrate compliance with the GCAA CAR 145 regulations for the intended scope of works.

e) During the compliance review, the MORC-AS must brief the contracted organisation about the process for GCAA CAR-145 application under MORC scheme.

f) The MORC compliance review must be documented in the internal auditing system of the organisation holding MORC privilege. A MORC-AS must produce an audit report.

g) The MORC audit report, which may include any identified safety concern(s), must be communicated to the nominated contracted organisation for their necessary actions. Any safety concerns shall be satisfactorily addressed before closure of the audit report.

NOTE: The MORC-AS must remind the contracted organisation of its accountabilities for any safety concern(s) having an impact on their current CAR-145 approval and their obligations to report to the GCAA of any such situation.

h) Upon closure of the MORC audit report, MORC Statement (GCAA Form AW-MORC-002) must be issued by the MORC-AS. The issuance of these documents confirms that the nominated contracted organisation satisfies the safety objectives of CAR-145 and in particular that any safety concern identified during the evaluation are effectively resolved.

i) All records collected during the MORC activity (which must include the MORC audit Report and associated MORC Statement issued by a MORC-AS) are retained as per the applicable record keeping system and policy. They must remain accessible to the GCAA at all times.

j) The contracted maintenance organisation applies to the GCAA only when the MORC Report and MORC Statement are issued. The contracted maintenance organisation must apply for an EXTENSION of their current GCAA approval for Scope of works which have been evaluated by the MORC-AS, in the e-Services, with the submission of the following required documentation:
   i. The MORC audit report and the completed MORC Statement ((GCAA Form AW-MORC-002); ii. Completed Form AWF-AMO-004 – Corporate Commitment by the Accountable Manager; iii. Copy of EASA Form 3 or equivalent; and iv. Copy of MOE Section 1.9 – Scope of Works or equivalent.

Recommendation No. 2:
Organisations holding MORC privilege must be aware of the following:

a) The GCAA will process and complete the application by the nominated contracted organisation, giving greater emphasises on the MORC audit report and MORC Statement issued by the MORC-AS. Application without the MORC audit Report and MORC Statement may be rejected.

b) The GCAA will periodically conduct oversight activities of the MORC Scheme by sampling the MORC audit reports to oversight the performance of the MORC-AS and to overall effectiveness of the MORC Scheme.
c) The GCAA will use the result of the MORC audit, as a basis for:
   i. Reviewing the competency of the MORC-AS; and
   ii. A regulatory review/action.

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