



GOVERNMENT OF INDIA  
**OFFICE OF DIRECTOR GENERAL OF CIVIL AVIATION**  
Opposite: Safdarjung Airport, New Delhi-110003

**AW Circular 2 of 2020**

File No. DGCA-25012(07)/2/2020-AW  
29<sup>th</sup> April 2020

**Subject: Measures for the CAR-145 Approved Organisations to deal with COVID-19 crisis regarding the management of the CAR-145 Approval**

**1. Introduction**

- 1.1. Consequent upon the lockdown declared by the Government of India due to COVID-19 outbreak, CAR-145 AMOs in the country/ across the globe are facing challenges to comply with their approved MOE procedures.
- 1.2. This Circular provides for CAR-145 AMOs who are facing difficulties to comply with their approved MOE procedures, to apply the concession process for deviation from the Organisation's Procedures as per their MOE Chapter 3.10 [Concession control for deviation from procedures], with the exceptional condition that those deviations shall be approved by the Quality Manager.
- 1.3. These concessions cannot be used by those AMOs that have been suspended or partially suspended within the last two years (between 1<sup>st</sup> March 2018 and 1<sup>st</sup> March 2020).
- 1.4. The deviations mentioned above are limited to the cases listed in the following paras and will have the prior approval of the Quality Manager of the AMO. Any other case not listed in the following paras, for which the AMO intends to apply for a deviation to the Organisation's Procedures, shall be addressed to DGCA for approval.
- 1.5. An internal concession register shall be established by the approval holder and made available at any time, upon request by DGCA for scrutiny.
- 1.6. This circular should be read in conjunction with DGCA Order No. DGCA 25012(07)/1/2020-AW - Extension of Validity of approvals issued under

Rules 133B and 133BA and licenses/ authorizations issued under Rule 61 of the Aircraft Rules, 1937 - COVID 19 Lockdown, dated 3<sup>rd</sup> April 2020.

## **2. Quality System**

### **2.1. Internal audit plan for 2020**

AMOs may revise their internal audit plan for 2020 to postpone those audits planned between 1<sup>st</sup> March 2020 and 30<sup>th</sup> June 2020, up to 30<sup>th</sup> September 2020. However, on a case by case basis, the AMOs may contact RAO/SRAO to discuss the possibility to use desk audits instead of on-site audits.

### **2.2. Audits to subcontractors for 2020**

AMOs may postpone the audits of subcontractors planned between 1<sup>st</sup> March 2020 and 30<sup>th</sup> June 2020, up to 30<sup>th</sup> September 2020.

AMOs may replace the onsite audits planned between 1<sup>st</sup> March 2020 and 30<sup>th</sup> June 2020 by desk audits when the sub-contracted maintenance work can be fully inspected by the AMO. If the results of the inspection performed by the AMO are not satisfactory then the AMO must intimate DGCA.

### **2.3. Internal findings**

AMOs may extend until 30 June 2020, those findings due dates (raised during the internal audits), which are not impacting safety.

### **2.4. DGCA findings**

On a case by case basis, the AMO may contact DGCA (RAO/SRAO) to discuss the possibility to extend the target date of compliance of Level 2 findings raised by DGCA with proper justification. Considering the case, DGCA (RAO/SRAO) may extend the validity for one month to support the industry. Any extension beyond one month shall be forwarded to DGCA Headquarters for consideration.

## **3. Changes to the organisation**

The notification to DGCA of following changes taking place between 1<sup>st</sup> March 2020 and 30<sup>th</sup> June 2020 can be postponed by AMOs until 30<sup>th</sup> September 2020.

a) Changes in the number of declared staff shall result in a reduction in the activity of the AMO proportional to the reduction of staff. (The man-hour plan

must show that that the remaining number of staff is sufficient for the workload of the organisation during the period of reduction).

*Note: In case of absence of a proper justification, the entire activity undertaken by the AMO during the period may be rendered invalid.*

- b) Interruption of the activity on some of the workshops or line stations;
- c) Complete interruption of the activity of the AMO for a period shorter than 60 consecutive days.

Other changes listed in CAR 145.A.85 shall be notified to the DGCA (RAO/SRAO). This includes, for example, changes to the nominated persons, or if the AMO has to interrupt completely all the activities for a period longer than 60 days.

#### **4. Extension of calibration due date**

AMOs may extend the calibration due date for the tools with calibration expiry date between 1<sup>st</sup> March 2020 and 30<sup>th</sup> June 2020, which cannot be sent for calibration to an approved laboratory due to COVID 19 crisis, in accordance with the following conditions:

- a) when the normal calibration period is  $\leq$  12 months, the extension of the calibration can be up to a maximum of 10% of the normal calibration, and;
- b) when the calibration period is  $>$  12 months, the extension of the calibration can be 10% of the normal calibration period up to a maximum of 3 months, and;
- c) the AMO has identified the risk associated to the use of the tool for the specific task in relation to continuing airworthiness of the aircraft, product or component as “low”, and;
- d) the tool is inspected before use and no damage or corrosion is identified, and;
- e) the tool was used at least once within the 3 months preceding the calibration due date, and;
- f) no deficiency with the use of this tool has been reported since the last calibration, and;
- g) the last two calibration results are not showing any possible issue (e.g.: drift in the value, value very closed to the acceptable limit, etc.) that can endanger the maintenance.

When the organisation has identified the risk associated to the use of the tool as not being “low”, the organisation shall receive the tool manufacturer extension acceptance (except alternate tooling), and shall take additional measures to verify and ensure the correct maintenance result and continuing

airworthiness of the aircraft, product or component such as: serviceability verification of the tool (e.g. using a calibrated master torque tester), or, verification of the measurement/ test/ job-result by other acceptable means.

**5. Tools and equipment periodical maintenance and facilities checks**

The AMO may extend the maintenance/ service due date for tools, equipment or the facilities periodical checks (e.g. external contracted company cannot visit the AMO) that should have been performed between 1<sup>st</sup> March 2020 and 30<sup>th</sup> June 2020, in accordance with the following conditions:

- a) the AMO has identified the risk associated to the use of the tool, equipment or the facilities for the specific task in regard to continuing airworthiness of the aircraft, product or component as “low”, and;
  - b) the last maintenance result is not showing possible issue that can endanger the maintenance, and;
  - c) no deficiency with the use of this tool, equipment of facilities has been reported since the last maintenance, and;
  - d) the tool, equipment or facility is inspected before every use and no damage, corrosion or deterioration has been identified.
6. Once the maintenance activities stabilise after the COVID-19 crisis, the Quality System shall assess the risk associated to the use of the concessions granted, with particular attention to the risk associated to those cases where maintenance personnel may have not worked in the maintenance environment for a prolonged time and any other possible implications of human factors aspects induced by the COVID-19 crisis.
7. This Circular is a temporary measure and is valid till 31<sup>st</sup> July 2020 or till the normal functioning of the AMO is resumed, whichever is earlier.

Sd/-  
(Ravi Krishna)  
Joint Director General of Civil Aviation