

Annex 1 to
Acceptable Means of Compliance (AMC) and Guidance
Material (GM) to Part-145

Annex 1 to AMC and GM to Part 145 is hereby introduced to provide flexibility during this COVID-19 pandemic difficult period regarding the measures for the Part-145 Approved Organizations to deal with COVID-19 crisis regarding the management of Part-145 Approval have been introduced by Annex 1 (See attached AMC). For the time being, this AMC will introduce for interested organization by mean of a concession and on a case-by-case basis.

Measures for the Part-145 Approved Organizations to deal with COVID-19 crisis
regarding the management of Part-145 Approval. Update September 2020

Part-145 AMOs who are facing difficulties to comply with their approved MOE procedures due to the COVID-19 crisis, may apply the concession process for deviation from the Organizations' Procedures as per their MOE chapter 3.10 (refer to CARC Guidance Procedure AWS 33 chapter 3.10 as amended), with the exceptional condition that those deviations may be approved by the Quality Manager and without further notification of CARC.

An internal concession register shall be established by the approval holder and made available at any time upon request by CARC. These concessions cannot be used by those AMOs that have been suspended or partially suspended after 1/2/2018.

The deviations mentioned above are limited to the cases listed in the following points. Any other case not listed in the following points, for which the AMO intends to apply for a deviation to the Organization's Procedures, shall be addressed to CARC for approval. Once the maintenance activities stabilize 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.

1. Non Destructive Testing (NDT)

NDT certificates (EN4179 point 8.5.1) and annual maintenance (EN4179 point 8.6) expiring between 1st March 2020 and 31st October 2020 may be extended until 31st December 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 1st February 2020 and 31st December 2020 up to 31st December 2020. On a case-by-case basis, the AMOs may contact CARC to discuss the possibility to use desktop audits instead of on-site audits or to postpone some audits to the next year.

2.2. Audits to subcontractors for 2020

AMOs may postpone the audits planned between 1st February 2020 and 31st December 2020 until 31st December 2020 to subcontractors.

The AMOs may replace the onsite audits planned between 1st February 2020 and 31st December 2020 by desktop audits when the sub-contracted maintenance work can be fully inspected on receipt by the AMO. If the results of the inspection performed by the AMO are not satisfactory then the AMO must contact CARC.

2.3. Internal findings

AMOs may extend until 31st December 2020 those findings due dates (raised during the internal audits), which are not affecting safety.

2.4. CARC findings

On a case-by-case basis, the AMOs may contact CARC to discuss the possibility to extend the findings raised by CARC. CARC concerned inspector may use the 3 months extension to support the industry. However, when the finding must remain open more than 6 months CARC concerned inspector shall coordinate any decision with AWS Director.

3. Individual authorizations for Aircraft Certifying Staff and Support staff (C/S and S/S) and Components/Engines/NDT Certifying Staff (CC/S)

3.1. Renewal of C/S, CC/S or S/S authorization with expiry date between 1st February 2020 and 31st December 2020.

C/S, CC/S and S/S authorizations becoming due between 1st February and 31st December 2020 can be renewed for 12 months after the original expiry date, if at the time of renewal the Quality Manager verifies the following requirements:

- CARC Part 66 license upon which the C/S and S/S authorization was issued is valid (see §3.1.1); and
- The individual C/S, CC/S and S/S satisfies the applicable MOE requirements for continuation training and competence assessment (alternative training methods and alternative competence assessment methods as described in 3.1.2 and 3.1.3 are also acceptable); and,
- The individual C/S, CC/S and S/S can demonstrate:
 - At least 100 days of experience (or 500 working hours) in the 24 months preceding the expiry date of the authorization; and,
 - The nature of experience is acceptable as per the current CARC Guidance

Procedure AWS-31 as amended or,

- If the nature of the experience is not acceptable as per the current CARC Guidance Procedure AWS-31 as amended, the C/S, CC/S and S/S authorization is renewed with limited privileges adequate to the nature of the experience (for example, only weekly check, only simple line maintenance tasks, only tasks in hydraulic system, etc.).

The renewal for a period of 12 months of the individual C/S, CC/S, S/S authorizations needs to be recorded in the internal concession register and the C/S, CC/S, S/S list needs to be amended. However, these changes to the C/S, CC/S, S/S list can be approved (indirect approval if the organization has this privilege) by the Quality manager of the AMO without CARC approval or notification to CARC.

Other changes to the C/S, CC/S, S/S list shall be managed in accordance with the approved MOE procedures including the involvement of CARC.

3.1.1. CARC Part 66 licenses

C/S, S/S authorizations becoming due between 1st February and 31st December 2020 can be renewed based upon CARC license with an expired due date when CARC has formally confirmed that considering the COVID-19 crisis the license is extended in accordance with CARC Advisory Circular No. AC-35-COVID19-01 as amended.

3.1.2. Competence Assessment of C/S, CC/S and S/S and qualified mechanics

Competence assessment of C/S, CC/S, S/S and qualified mechanics due between 1st February 2020 and 31st December 2020 can be extended until 31st December 2020.

Alternative method: The AMO may use online questionnaires, video conference or other means to perform the competence assessment without extension.

3.1.3. Continuation training of C/S, CC/S and S/S and qualified mechanics

Continuation training of C/S, CC/S, S/S and qualified mechanics due between 1st February 2020 and 31st December 2020 can be extended until 31st December 2020, with the condition for C/S, CC/S and S/S that they received sufficient continuation training in the preceding 2-year period. Where, such continuation training was not sufficient according to the defined MOE procedures or not done, the AMO can identify the involved staff in the concession and replace any continuation training standard defined in the MOE with a newly defined continuation training package composed by any (or combination) of the following means:

- Online training;
- Self-training /self-study;
- Read and sign documents issued by the organization.

4. Continuation training and competence assessment for all staff except C/S, CC/S, S/S and qualified mechanics

Continuation training and competence assessment of maintenance staff (except C/S, CC/S, S/S and qualified mechanics) which is due between 1st February and 31st December 2020 be extended until 31st December 2020.

The AMO may consider replacing the classroom training by “online training” or “self-training /self-study” to perform the continuation training without extension.

The AMO may use online questionnaires, video conference or other means to perform the competence assessment without extension.

5. Changes to the organization

The notification to CARC of following changes taking place between 1st February and 31st December 2020 be postponed until 31st December 2020.

- Changes in the number of declared staff consisting in a reduction of staff provided there is a reduction in the activity of the AMO proportional to the reduction of staff.

(The man-hour plan must show that the remaining number of staff is sufficient for the workload of the organization during the period of reduction).

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

Other changes listed in 145.85 shall be notified to CARC, this includes, for example, changes to the nominated persons, or if the AMO has to interrupt completely all the activity for a period longer than 60 days.

6. Calibration

6.1. Use of calibration laboratories

For the tools with calibration expiry date between 1st February 2020 and 31st December 2020 which cannot be sent for calibration to a laboratory in compliance with CARC Guidance Procedure AWS-36 as amended, the AMO can use a calibration laboratory which does not comply with the CARC Guidance Procedure AWS-36 as amended, provided this calibration laboratory:

- Is accredited to ISO/IEC 17025 by the national body; and,
- Is holding the tool in the calibration capability list; and,
- Has been evaluated by the AMO as having the appropriate data (calibration procedures and specifications), equipment and expertise to carry out the calibration.

6.2. Extension of calibration due date

The AMO may extend the calibration due date for the tools with calibration expiry date between 1st February 2020 and 31st December 2020 cannot be sent for calibration to a laboratory in compliance with CARC Guidance Procedure AWS-36 as amended or with point 6.1 above, in accordance with the following conditions:

- When the normal calibration period is ≤ 12 months the extension of the calibration can be up to a maximum of 10 % of the normal calibration, and;
- 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;
- 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;
- The tool is inspected before use and no damage or corrosion is identified, and;
- The tool was used at least within the 3 months preceding the calibration due date; and,
- No deficiency with the use of this tool has been reported since the last calibration; and,
- 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 organization has identified the risk associated to the use of the tool as not being “low”, the organization 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.

7. 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 Part-145) that should have been performed between 1st February 2020 and 31st December 2020, in accordance with the following conditions:

- 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;
- The last maintenance result is not showing possible issue that can endanger the maintenance, and;
- No deficiency with the use of this tool, equipment or facilities has been reported since the last maintenance, and;
- The tool, equipment or facility is inspected before every use and no damage, corrosion

or deterioration has been identified, and;

- The tool, equipment of facility is inspected before every use.

8. Occasional Line Maintenance

The use of “non-approved location” under the conditions detailed in CARC Guidance Procedure AWS-33 as amended between 1st February and 31st December 2020 can be extended from 30 days to 90 days. This means that an AMO intended to support a Jordanian registered aircraft could maintain and release the aircraft without having the obligation to get the approval of a new line station and without the need to declare the location in the MOE 5.3 (list of line maintenance locations as per 145.75 (d) for the above-mentioned period.

9. CARC Accepted Foreign Maintenance Organization

The use of “CARC accepted foreign maintenance organization” under the conditions detailed in JCAR Part 145 and CARC approved MOE supplement of the foreign AMO MOE in which CARC acceptance expired between 1st February and 31st December 2020 until 31st December 2020. This means that CARC accepted foreign AMO intended to support a Jordanian registered aircraft and or product could maintain and release the aircraft without having the obligation to renew CARC foreign maintenance organization acceptance for the above-mentioned period provided a self audit showing compliance with Part 145 is performed by the quality management along with a clear statement of compliance, this audit and statement to be sent to CARC.

CARC may revise foreign AMO acceptance renewal audit plan for 2020 to postpone those audits planned between 1st February 2020 and 31st December 2020 up to 31st December 2020. The extended expiry date duration will be deducted during the certification renewal once CARC carried out certification including on-site-audit and/or remote audit along with the required fees.

10. CARC Management of aviation safety risks during the coronavirus (COVID-19) pandemic/ Adapting oversight and surveillance activities.

The successful management of the COVID-19 pandemic requires the assessment and management of risks that extend beyond the boundaries of managing aviation safety risks as defined in ICAO Annex 19 “Safety Management” and ICAO Doc 10144 as amended “ICAO Handbook for CAAs on the Management of Aviation Safety Risks related to COVID-19”.

Managing the safety risks as a result of the pandemic provides an opportunity to test existing or develop new capabilities. Examples of potential new capabilities include conducting surveillance activities remotely, operating effectively with reduced non-essential movements and encouraging remote working. This may also require staff to work from home, impacting the ability to conduct the same level of on-site oversight activities, and using digital platforms to communicate more tactically to fulfil the safety oversight obligations.

During restrictions on movement, routine on-site surveillance may not be possible. Surveillance should be based on a safety risk management approach. Remote and desktop surveillance activities may be performed to carry out a review of documents, procedures and evidence of activities and regulatory compliance.

Checklists shall be used, with evidence of compliance provided by the organization itself. Audits can be conducted via teleconference and adjusted to the operations of the maintenance organizations.

This will likely be the only method of direct communication with a maintenance organization. Time should be prioritized in discussing changes, safety risks and hazards to ensure that the maintenance organization is carrying out effective hazard identification and continuous compliance with the regulatory requirements.

