

Notice No.

AWN - 04-20

Date:

20 March 2020

BCAA Airworthiness Process Changes to Address COVID-19 Force Majeure



1 INTRODUCTION

- 1.1 BCAA acknowledged the need to react effectively to the challenges created by international restrictions to the Covid-19 pandemic in 2020. It has been our aim to maintain our high standards of airworthiness and safety throughout this period, whilst continuing to provide timely and effective regulatory services to support the aviation industry.
- 1.2 Two principle aspects of our activity were affected by Covid-19 restrictions, the issue and renewal of certificates for aircraft and the issue and renewal of approvals to organisations. These activities were managed in the following manner, over the period of the pandemic.

2 BACKGROUND

- 2.1 BCAA obligations and responsibilities under ICAO and the AN(OT)O will continue to apply during this period and as such, we have established alternative processes to manage the risks presented, by those aspects of our work which cannot be completed, under current travel restrictions.

3 INSTRUCTIONS

3.1 Aircraft Certificates of Airworthiness - Issue, Renewal, Export

- 3.1.1 These Covid-19 alternative technical procedures took effect in March 2020 and will remain in force until 01/04/2021.
- 3.1.2 **Owner/Operator Applications (AIRS) for issue, renewal and export.** The AIRS application process remains unchanged. Noting that all required documents (referenced in the forms) will now need to be presented together with the application (BCAA Form AW201).
- 3.1.3 **Early Certificate of Airworthiness Renewal Applications.** Under existing processes, applicants may apply for CofA renewal up to 90 days prior to the certificate expiration date; all certificates falling due before 01/04/2021 may therefore be recommended for renewal and be renewed by BCAA, under the revised processes described herein.
- 3.1.4 **Process including Physical Inspection by a CAMO, supporting the AW201 recommendation.** In addition to the documentary review, a physical inspection by a CAMO authorised person would normally be required by their (MCM or CAME) procedures, in support of the issue and renewal of Certificates of Airworthiness for Bermuda registered aircraft. Under current restrictions, BCAA accepts a CAMO may contract-out this inspection to a Licensed and Type rated AMO engineer or representative of the AMO Quality department. The inspection should continue to follow the CAMO's guidelines for the physical inspection content (or BCAA AW202) and findings made during an inspection should be managed to closure, prior to a recommendation being made, in the normal manner.



- 3.1.5 **Process without Physical Inspection by a CAMO, supporting the AW201 recommendation.** In those rare cases where an aircraft cannot be positioned to a location where a CAMO representative, or suitably qualified individual, can be made available to support an inspection; the issue of certificates without any form of physical inspection supporting the recommendation of the CAMO will be considered on a case-by-case basis. However a certificate issued without any prior physical inspection supporting the recommendation, will be limited to a validity of 3 months. In order to obtain a full 1 year CofA, a further application in accordance with paragraphs 3.1.2 to 3.1.4 above would then need to be made.
- 3.1.6 **CAMO Process for Export Certificates.** When presenting an aircraft for an Export Certificate, a CAMO will need to follow the above process at 3.1.4, where the subject aircraft is holding an extant Certificate of Airworthiness. When there is no valid Certificate of Airworthiness the CAMO must support the foregoing document review and physical inspection, with a full AAR in accordance with OTAC 21-6.
- 3.1.7 **BCAA Inspection and Evaluation of Aircraft Airworthiness (see also 3.1.16).** BCAA is required, under current travel restrictions, to transition to a process wherein if necessary, it will issue Certificates of Airworthiness, without completing our own prior onsite physical survey. In order to mitigate risks associated with this temporary change, when BCAA notifies an applicant of its inability to attend the aircraft inspection, BCAA will require applicants to provide the following:
- 3.1.8 All of those aircraft records specified by the AW201 application form on Pages 1 through 4 including those listed at 'AIRCRAFT RECORDS CHECKLIST' are to be provided, in digital format, at time of submission of the AW201.
- For new Aircraft at time of CofA Issue – all records
 - For used aircraft at time of CofA Issue – the previous 5 years of records
 - For in-service aircraft at time of Cof A Renewal - the previous 2 years of records
 - For used aircraft at time of CofA Export – the previous 5 years of records

and

- 3.1.9 In addition to the above records the applicant should provide;
- 12 months of Technical Log Sector Record pages (all pages for new aircraft)
 - Damage Charts
 - List of Deferrals for previous 12 months
 - Repair approval documents in support of modifications and repairs

and

- 3.1.10 High-quality photographs (date-stamped) taken during the CAMO inspection, in preparation of their recommendation; these images will need to show:
- Aircraft ownership, Engine and APU data plates
 - Aircraft registration plate and exterior registration markings
 - Aircraft exterior view L/H and R/H (front/centre/rear)
 - Wings and Empennage L/H and R/H
 - Landing Gear
 - Interior of Flight Deck



- Interior of Cabin with particular emphasis on safety equipment
- Safety card

3.1.11 BCAA Inspecting staff and Designees will adjust their process as follows;

3.1.12 BCAA Inspectors and Designees will conduct a thorough review of the aircraft airworthiness documents and those photographs provided by the CAMO applicant with each issue, renewal or export application.

3.1.13 BCAA Inspectors and Designees will make a recommendation on the normal form, but will not complete the aircraft inspection section, instead they will record on the survey form "Covid-19 – procedure AWN 04-20 applied".

3.1.14 BCAA will continue to issue certificates of 1 year validity based upon this revised process until 01/04/2021. After which time, BCAA will either revert to the standard process or notify any necessary continuation of this Covid-19 alternative process.^{1, 2}

3.1.15 BCAA Inspecting staff may request further detailed images or information to enable acceptance of the CAMO recommendation. Any findings from the BCAA desktop inspection will be communicated to the CAMO on the BCAA Aircraft Findings Report, referenced Form AW205, for action prior to issue or renewal of the certificate.

3.1.16 **BCAA Evaluation of Aircraft Airworthiness (additional information for 83bis Aircraft).** BCAA Inspecting staff in the Russian Federation remain available to make internal and some international travel in the course of their duties. This permits BCAA to continue with routine oversight processes in the Russian Federation, Azerbaijan, Kazakhstan and Tajikistan for the near term. BCAA will however adopt the process referenced at paragraph 3.1.7 above, when and if imposition of travel restrictions makes it necessary to conduct issue and renewal recommendations, without the prior physical survey of each aircraft by our Inspectors. In order to mitigate risks associated with this situation, BCAA will adopt the controls at item 3.1.7 above and where possible, move to a system of ramp sampling inspections for in-service aircraft, to give the greatest flexibility to our Inspecting team, to allow them to make physical inspections of the fleet for the assurance of Airworthiness, when and where accessibility allows.³

NOTE 1: Aircraft subject to issue or renewal of the Certificate of Airworthiness under the Covid-19 alternative process, without BCAA onsite physical inspection, will be subject to a physical inspection at the subsequent renewal, before returning to the risk assessed renewal frequency.

NOTE 2: Should it prove possible to conduct an onsite physical survey under our routine working practises during this period, any risk assessed inspection frequency would continue to be applied subsequently.

NOTE 3: All aircraft operating under Article 83bis may be subject to ad-hoc Ramp Survey during the period of these alternative processes.



3.2 **AMO & CAMO Organisation Approvals – Initial, Renewal, Change.**

- 3.2.1 **BCAA Option 1 approvals** are issued based on compliance to existing approved procedures and supplemental OT procedures. As a high level of confidence exists for the procedures approved by FAA/EASA/TCCA and there is pre-existing onsite oversight by the approving NAA, BCAA is prepared to issue approvals without prior onsite visit. Oversight will be planned after issue of the approval and within the first year of approval.
- 3.2.2 **BCAA Option 2 approvals** require BCAA to review and approve all approval related procedures and there is no onsite oversight which may be credited. For these reasons, under the Covid-19 travel restrictions, BCAA may be forced to significantly delay applicants, or mitigate risk by alternative means.
- 3.2.3 **Application Process.** Applicants will follow the standard application process. New and Renewal applicants will be asked to apply in the normal way (AIRS) and supply their Exposition and other supporting procedures and documents, in addition they will be asked to complete a Desktop Audit proforma.
- 3.2.4 **BCAA Desktop Audit Findings Process.** Further to the Desktop Audit, any findings will be communicated to the applicant on the BCAA Audit Findings Report, referenced Form AW207, for action prior to issue or renewal of the approval.
- 3.2.5 **BCAA Organisation Approval Issue Process.** For Option 1 approvals BCAA will issue a new full approval of 2 years validity, subject to a satisfactory desktop audit, with an onsite audit deferred, to be completed prior to the end of the initial year of the approval. For Option 2 approvals BCAA will issue a limited approval for a period of 6 months, within which time it will plan and conduct the required onsite oversight activity and subject to satisfactory audit issue the full 2 year approval from the inception date of the initial limited approval.
- 3.2.6 **BCAA Organisation Approval Renewal Process.** For Option 1 and Option 2 approvals BCAA will renew approvals for 2 years, based upon a satisfactory desktop audit.

3.3 **BCAA Aircraft Certificates Form and Format**

- 3.3.1 In order to ensure that we have the greatest level of flexibility to continue to support our customers and in the interests of enhanced data security, BCAA has implemented digital signature for Certificates of Airworthiness and Organisation Approvals.
- 3.3.2 BCAA electronic documents are presented in pdf format, digitally signed and supported by third party authentication, from a trusted source, to validate the digital signatures, supporting the authenticity of the documents and their certification. Further information on BCAA digital documents is available from the BCAA website.

4 **ENQUIRIES**

- 4.1 Enquiries regarding the content of this Notice should be addressed to the Bermuda Civil Aviation Authority. Enquiries can be sent by email to info@bcaa.bm.



Thomas Dunstan, Director General