

Continuing Airworthiness Notice – 05-011 Rev 5



Continuing Airworthiness of Aircraft in reduced operation due to COVID-19 Restrictions.

8 October 2021

Issued by the Civil Aviation Authority of New Zealand in the interests of aviation safety. A Continuing Airworthiness Notice (CAN) is intended to alert, educate, and make recommendations to the aviation community. A CAN contains information and guidance about an airworthiness concern that does not meet the criteria for an Airworthiness Directive (AD). The inspections and practices described in this CAN must still be carried out in accordance with the applicable NZCAR Parts 21, 43 and 91.

CAN numbering is by ATA Chapter followed by a sequential number for the next CAN in that ATA Chapter.

Applicability:

All aircraft operators.

Purpose:

The purpose of this Continuing Airworthiness Notice (CAN) is to advise aviation participants of the current situation regarding aircraft operations for maintenance under COVID-19 restrictions.

Revision 5 of this CAN is raised to address the change in Alert Level advice for the Auckland area announced 7 October 2021, and to outline the remaining restriction on flying non-essential aircraft under Alert Level 3.

Background:

The original issue of this CAN on 28 April 2020 was prompted by the introduction of the government's COVID-19 Level 4 Lockdown restrictions on 25 March 2020, which resulted in the cessation of aircraft operations deemed non-essential services.

For operators affected by these restrictions, it was anticipated aircraft would be in storage for several weeks with restrictions in place preventing both operation and maintenance. It was also anticipated that operators would face costly and time-consuming maintenance activities following extended COVID-19 restrictions.

On 18 April 2020, the Director General of Health agreed to designate aircraft maintenance as an essential service and to allow aircraft that were considered to be at risk to be maintained in accordance with the manufacturer's instructions during all Alert Levels.

CAA subsequently issued authorisations for aircraft operators to fly their aircraft once per month to maintain engine condition, and also to fly their aircraft to a place for essential maintenance.

On 13 May 2020, New Zealand moved to Alert Level 2, making CAA approval via CAA Form 24091/C19 unnecessary. The form was removed from the website and no further applications were processed.

Previously issued (dated 2020) CAA 24091/C19

Due to changes in the Alert Level guidance since 2020, operators who hold an approved CAA 24091/C19 *Application for operation or maintenance of an aircraft during COVID-19 restrictions* which was issued during the 2020 Covid-19 Alert level 4/3 lockdown are advised that the Director's approval is no longer applicable.

The Director General of Health's decision on Saturday 18 April 2020, which underpinned CAA's authorisation for flight or maintenance via CAA 24091/C19, is no longer in force.

Therefore, the approvals issued to operators on CAA 24091/C19 are also no longer applicable. Operators do not need to return the old forms, but they may wish to retain them as part of their operator records.

Current Situation – October 2021:

Alert Level 3 (October 2021)

Under Alert Level 3 all businesses can operate, but with restrictions such as physical distancing, additional hygiene requirements etc. This means that provided the necessary health precautions are taken, maintenance of non-essential aircraft may be carried out under Alert Level 3.

See: <https://covid19.govt.nz/alert-levels-and-updates/alert-level-3/#work-and-business>

Businesses that require close physical contact cannot open.

Auckland Region - Flying of non-essential aircraft during Alert Level 3

Flying aircraft for recreational purposes is allowed in the Auckland Area during Alert Level 3.

See: <https://covid19.govt.nz/alert-levels-and-updates/regional-advice/auckland/>

Waikato Region - Flying of non-essential aircraft during Alert Level 3

CAA have been granted authority by Ministry of Health to approve flights in the Waikato region of non-essential aircraft, only where the operator has demonstrated that the flight is essential for the purpose of ensuring continuing airworthiness.

This means that the operator must provide evidence to CAA that the aircraft **must** be flown on an A to A flight to ensure continuing airworthiness, or that the aircraft **must** be flown to a maintenance location to undergo maintenance to ensure continuing airworthiness.

CAA authority is limited to approving flights where an operator:

- is able to provide evidence that flying the aircraft is essential (for example a specific reference in the aircraft Instructions for Continuing Airworthiness (ICA) stating that the aircraft must be flown), and
- can observe all other Covid Alert Level 3 guidelines and requirements.

The determination of what is essential with regards to continuing airworthiness must be made by the operator, with reference to the appropriate ICA.

Operators who **must** fly non-essential aircraft during Alert Level 3 restrictions need to apply to CAA by submitting a completed Form CAA24091/C19 ([found here](#)).

Form CAA24091/C19 enables an operator to apply for approval for either an A to A flight (if there is evidence of this requirement in the ICA), or for a flight to another location (appropriate distances) to undergo essential maintenance. In either case, the details of the actual flight (including the planned return flight) to be carried out must be detailed on the application.

The operator's justification for flight must include a specific reference to the aircraft ICA, or other appropriate source of data. Reference to an appropriate document must be made on the application form. Forms which are not complete, including those where a specific requirement for flight cannot be evidenced, **will not be processed**.

If an operator has the option to ensure continuing airworthiness of the aircraft without flying, or if it is practicable to conduct remedial maintenance after a period of inactivity, then the aircraft should not be flown. Maintenance which can be appropriately deferred by the operator cannot be considered essential.

Operators who wish to fly an unairworthy aircraft to carry out essential maintenance, must also apply for a Special Flight Permit.

For non-essential aircraft under Alert Level 3, it is vitally important that only those flights which are necessary, and which are approved by CAA are undertaken.

For enquiries relating to specific operations or maintenance, please contact the Ministry of Transport at essentialtransport@transport.govt.nz

Travel between Alert Levels

The air boundary between Auckland and the rest of New Zealand, including the Alert Level 3 area in Waikato, remain in place.

See: <https://covid19.govt.nz/alert-levels-and-updates/regional-advice/auckland/>

CAA is unable to issue exemptions to travel restrictions. **CAA cannot authorise any travel between Alert Level regions.** This includes flying or ground transport to another location outside of the originating Alert Level region for maintenance to be carried out.

For enquiries related to travel between Alert Level regions and to apply for a travel exemption, please contact the Ministry of Health.

See: [COVID-19: Travel within New Zealand | Ministry of Health NZ](#)

(Note: CAA has applied for travel exemptions for those operators needing to move between Alert Level 4 and Alert Levels 3/2 in order to conduct essential maintenance on their aircraft. This application is in process. However, at this stage no operators may travel between Alert Level 4 and Alert Levels 3/2 unless granted a specific travel exemption from the Ministry of Health.)

Additional information on Covid-19 restrictions can be found here:

[COVID-19 transport information | Ministry of Transport](#)

Private and recreational aircraft airworthiness:

Over the course of the initial worldwide lockdowns due to Covid-19, additional guidance and support from major engine manufacturers became available indicating that prolonged periods of inactivity may not be as detrimental to engine condition as originally anticipated (if appropriate procedures were followed).

It is recommended that aircraft owners and operators review the ICA (Maintenance Manual, Service Letters, Service Bulletins etc) relevant to their aircraft for procedures for storage, protection, and return to service for their aircraft and engine(s) following extended periods of inactivity.

If they are unable to find appropriate information, operators should contact the product manufacturer seeking support.

Changes to Alert levels:

CAA will update this Continuing Airworthiness Notice to address the changing Alert Level status of the country.