

Continuing Airworthiness Notice – 05-011 Rev 1



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

28 April 2020

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 non-regulatory information and guidance 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 remind operators of their responsibility for continuing airworthiness and to publish the **application and approval process** (see section below), and the conditions under which an operator (not deemed an essential business*) may operate or maintain their aircraft during the period of COVID-19 restrictions (Alert Level 4 and those operators unable to operate under Alert Level 3 restrictions).

Revision 1 of this CAN is raised to address the different COVID-19 restrictions in Alert Level 4 and Level 3.

Note: This CAN does not address aircraft operations beyond those specifically required to ensure continuing airworthiness, nor does it address operation or maintenance for those deemed essential service providers (who do not require authorisation).

*Essential business is explained on the Government COVID-19 [website](#)

Background:

This CAN is prompted by the introduction of the government's COVID-19 Level 4 Lockdown restrictions, which have resulted in the cessation of aircraft operations deemed non-essential services. For those operators affected, aircraft may be in storage for several weeks with restrictions in place preventing both operation and maintenance. Under these circumstances, operators will face costly and time-consuming maintenance activities following the easing of COVID-19 restrictions, which will prolong the NZ aviation systems return to operation.

On Saturday 18 April 2020 the Director General of Health agreed to allow aircraft that are at risk to be maintained in accordance with the manufacturer's instructions during all Alert Levels (Alert Level 4 and those operators unable to operate under Alert Level 3 restrictions).

This revised CAN is prompted by the introduction of the government's COVID-19 Level 3 Lockdown restrictions, which continue to restrict aircraft operations deemed recreational activity. Under COVID-19 Level 3, maintenance of all aircraft in accordance with manufacturer's instructions is permitted, however, **operation of recreational aircraft (i.e. private, non-commercial operators) remains prohibited unless authorised by CAA.**

Recommendation:

If a breach of Alert Level 4 or Level 3 restrictions is required, CAA approval must be requested prior to maintenance activity, flight, or operation of, an aircraft.

Participants undertaking any aviation activities during COVID-19 restrictions must ensure that they

- Minimise, or eliminate (if possible), the physical interaction among staff.
- Ensure appropriate health, hygiene and safety measures are in place.
- Undertake only those maintenance activities which are detailed in manufacturer's instructions for continuing airworthiness.

Under Alert Level 4 –

CAA will approve urgent maintenance of aircraft, provided there is a demonstrable need for essential maintenance

- Typically, manufacturers describe a minimum utilisation of their aircraft necessary to ensure continuing airworthiness. When flying hours are reduced operators cannot comply with minimum utilisation requirements and they must then follow relevant Instructions for Continuing Airworthiness (ICA), e.g. Aircraft or Engine Maintenance Manuals, in the form of a preservation programme.

- The requirements of the preservation programme are likely to vary greatly between manufacturers, ranging from a repetitive engine ground run, to disconnecting the fuel system, to a maintenance process requiring specialist materials. In all cases, operators must ensure compliance with relevant ICA's and make record of the action taken in the aircraft logbook.
- Operators who cannot identify ICA's (i.e. preservation procedures) for their aircraft, or who cannot comply with the ICA's for any reason (e.g. the aircraft has not flown according to the minimum utilisation requirements), should approach the aircraft/engine manufacturer for an alternative method to restore airworthiness.

Operators who wish to fly their aircraft to a maintenance location to enable preservation action to be completed should follow the application process below.

Under Alert Level 3 -

CAA approval must be requested prior to flight, or operation, of recreational aircraft for the purposes of either-

- Preservation of engines by flying the aircraft for the period specified in the manufacturer's instructions for continuing airworthiness (**Restricted aircraft operation to ensure continuing airworthiness**)
- Flight of an aircraft to an appropriate location where maintenance may be carried out (**Relocation of aircraft to a maintenance provider**)

Operators who wish to fly their aircraft as detailed above, should follow the application process below.

Operators who wish to fly an aircraft which has not been maintained in accordance with its maintenance schedule must also apply to CAA for a special flight permit, detailing the items of non-compliance. CAA will not charge for the issuance of a Special Flight Permit under these circumstances.

Note: A certificate of fitness for flight (which is normally required for the issue of a special flight permit) will not be required if the reason for the aircraft not being airworthy is limited to maintenance schedule over-run.

Application and Approval process:

Operators must complete CAA 24091C19 (available on CAA website at [FORMS](#) and return to airworthiness@caa.govt.nz).

Where possible, groups who are subject to the same operating provisions (aero clubs for example) are encouraged to make a combined application.

Approval will be granted by letter detailing those individuals approved to conduct activities during the COVID 19 restriction period.

Restricted aircraft operation to ensure continuing airworthiness.

Where aircraft ICA's identify a minimum utilisation (e.g. 1 hour flight every 30 days, etc.) to ensure continuing airworthiness and no other practicable preservation procedure is available, operators must ensure compliance with the following:

1. The Operator must comply with all relevant CAA rules.
2. The flight must land at the same airfield it departed from (A to A flight), with no passengers.
3. The flight duration and frequency must be the minimum practicable, per the relevant ICA.
4. The flight crew must be the minimum required for safe aircraft operation.
5. The pilot must record the flight in the aircraft tech log, and their pilot's logbook, with the following statement: *'Flight of xxx duration completed to ensure continuing airworthiness of the aircraft during COVID-19 restrictions in accordance with (insert specific ICA reference)'*.
6. The statement in (5) above must be annotated in the aircraft and engine logbooks and include reference to the acceptable technical data used. The reference to acceptable technical data must be specific, for example *"Continental Aerospace Technologies Service Bulletin SB20-03, dated 13 April 2020, Part II"*.
7. You (as the Operator) must undertake these activities in a manner which ensures the health and safety of those affected as far as reasonably practicable. Guidance on health and safety during COVID-19 restrictions is available on the government COVID-19 [website](#).

Relocation of aircraft to a maintenance provider.

Under Alert Level 4 –

Where an aircraft needs to be relocated to another aerodrome so that essential maintenance activity can take place, a one-off ferry flight for the purposes of maintenance may be authorised provided there is a clear need for the flight

and this flight, including crew details, location of departure, location of arrival and expected date, must be included in the request for authorisation

Under Alert Level 3 –

Where a recreational aircraft needs to be relocated to another aerodrome for the purpose of undergoing maintenance in accordance with manufacturer's instructions, a return ferry flight for the purposes of maintenance may be authorised.

Details of the need for the flight, crew details, location of departure, location of arrival and expected date, must be included in the request for authorisation.

Activity that is not permitted

1. Gatherings of people that are not required to complete either the maintenance or aircraft operations.

2. **Under Alert Level 4 –**

For non-essential service providers –

Any flying activity not directly related to ensuring continuing airworthiness, or transiting to and from maintenance provider (i.e. no BFR, no competency checks or training).

An activity that is not related to maintenance to prevent degradation of airworthiness.

3. **Under Alert Level 3 –**

For recreational aircraft –

Any flying activity not directly related to ensuring continuing airworthiness, or transiting to and from maintenance provider (i.e. no BFR, no competency checks or training).

Maintenance on recreational aircraft not required for continuing airworthiness in accordance with the manufacturer's instructions is not permitted under Alert Level 3 (i.e. no third-party modifications).

Process for Authorisation:

1. Requests for authorisation must be sent by completion of the [application form](#)

Note: postal and hand submissions will not be accepted.

2. Provide details in the form of the following:

Note: that any missing details means you will not receive an authorisation, and due to the expected volume of requests you will only receive a "declined" message and not receive a request for further information.

(The more complete, concise and clearer the application, the quicker the application can be processed) :

- a. Explain how you will meet the COVID-19 Level 4 / Level 3 requirements regarding social distancing, self-protection and hygiene principles during this activity.
- b. Provide details of the aircraft (tail number, make & model)
- c. Provide details of the ICA to be used, including a reference to the document specifying the maintenance activity (or maintenance flight) and frequency.
- d. Provide the name(s) (and CAA Client ID) of the minimum essential personnel who will be completing the maintenance activity, including ground crew (certifying LAME) and/or pilot (or pilots where multi-crew are required per the AFM) where applicable.
- e. Provide the date(s) and location(s) of the maintenance activity and flight, where applicable.
- f. If a flight is required in accordance with the ICA, the frequency and duration of the flight required by the ICA, and the operating aerodrome.
- g. Provide the date(s) and location(s) of the once-off re-positioning flight, if this is required in order to re-position the aircraft for essential maintenance or storage.
- h. Provide details on how you will ensure the operation is safe.

Maintenance actions to ensure continuing airworthiness

(for aircraft maintenance activity for non-essential operators under Level 4 restrictions & only required if maintenance activity requires a breach under Level 3 restrictions)

- a. Explain what essential maintenance activity is needed to be conducted during Level 4, and why this work must be carried out to ensure the aircraft airworthiness does not degrade during lockdown.
- b. Explain what maintenance activity is needed to be conducted during Level 3, and why this work may breach Level 3 restrictions.

Relocation of aircraft to a maintenance provider

(for restricted aircraft operation for non-essential operators under Level 4; & recreational (e.g. private/non-commercial) operators under Level 3 restrictions)

- a. Provide flight details, including date range for return flight.
- b. Provide details on reporting methods, how you will ensure flight following/observation, how you will ensure safe completion of the maintenance or flying activity and how SAR is contacted if there were to be an incident.

Restricted aircraft operation to ensure continuing airworthiness

(for restricted aircraft operation for non-essential operators under Level 4; & recreational (e.g. private/non-commercial) operators under Level 3 restrictions)

- a. Provide flight details, including date range for return flight.
 - b. Provide reference to the relevant ICA including the frequency and duration of the flight required by the ICA, and the operating aerodrome.
 - c. Provide details on reporting methods, how you will ensure flight following/observation, how you will ensure safe completion of the maintenance or flying activity and how SAR is contacted if there were to be an incident.
3. CAA will assess the need application and if appropriate, will issue a letter of authorisation allowing you to conduct the activity as stated. This letter of authorisation will refer to the details within the request for authorisation application form and the conditions of the CAN 05-011.
 4. Retain the letter and keep a copy of the letter, application form and CAN 05-011 on you when conducting the activity. Failure to do so may result in you becoming liable for prosecution due to breaching the Alter Level 3 / Level 4 restrictions.
 5. Record the maintenance activity in the aircraft tech log, aircraft logbook and pilot logbook (if a flight was conducted) in accordance with the CAN wording above.

Maintenance and Operation Practices

The following practice criteria provide guidance for those involved in the maintenance and operation of affected aircraft:

- Limit work to only that detailed in the manufacturer's instructions for continuing airworthiness (this does not include incorporation of third-party modifications, for example) under Level 3.
- Limit work to only that needed to avoid the degradation of aircraft airworthiness (this does not include incorporation of upgraded equipment, for example) under Level 4.
- Keep precise and up to date phone and address information for all maintenance workers until the end of the pandemic. This information is important for the process of contact and tracing people, should it be required to track down and prevent the further spread of COVID-19.
- Limit, or eliminate if possible, physical interaction between staff, for example:
 - Minimise the number of maintenance staff working during Alert Level 3 or 4.
 - Operate split shifts, or introduce staggered start times and meal breaks.
 - Adhere to the physical distancing requirements to ensure at least a 2m physical separation between staff. For further information refer: <https://covid19.govt.nz/covid-19/how-were-uniting/physical-distancing/>
- Provide hygiene basics of handwashing and sanitisers. Specific further guidance can be found at: <https://covid19.govt.nz/covid-19/how-were-uniting/wash-your-hands/>
- Most maintenance workers should not need to use Personal Protective Equipment (PPE), assuming they can maintain physical distancing from other people. Further information can be found here: https://www.health.govt.nz/system/files/documents/pages/hp7353-ppe-ipc-poster-nonessential-final-28mar2020-v2_0.pdf. Further information is also available here: <https://www.health.govt.nz/our-work/diseases-and-conditions/covid-19-novel-coronavirus/covid-19-novel-coronavirus-health-advice-general-public/covid-19-face-mask-and-hygiene-advice>
- Ensure appropriate cleaning of tools, machinery and staff facilities, with specific cleaning at the end of a shift. Guidance on how to clean surfaces correctly is available here: <https://covid19.govt.nz/covid-19/how-were-uniting/cleaning-surfaces/#how-do-we-get-rid-of-the-virus-on-surfaces>

- Ensure staff who are unwell, or may have been in contact with someone with COVID19 to stay at home

Enforcement

New Zealanders are relying on each other to keep everyone safe and stop the spread of COVID-19. If operators are too generous in their interpretation of what is essential or flout these requirements, then the Government will take further action and breaches will be reported to the New Zealand Police.

Note:

For Lycoming engine preservation for stored engines refer to Lycoming Service Letter No. L180B, dated 13 November 2001, or later revision.

For Continental engine preservation for stored engines refer to Continental Aerospace Technologies Service Bulletin SB20-03, dated 13 April 2020, or later revision.