

10 Sep 2026

Design Delegation Holder Advice  
Address: Electronic Correspondence

Kia ora Design Delegation Holders,

### **AC146-1 and AC146-2: Delegations for the approval of design changes**

We are pleased to advise that AC146-1 (Revision 3) and AC146-2 (Revision 0) have now been published on the CAA website [here](#).

Thank you for all the submissions made during consultation on both advisory circulars. The purpose of this letter is to communicate the CAA's position on key points of clarification for the final version of each AC.

#### ***Scope of AC146-1 revision***

The purpose of Revision 3 to AC146-1 was to call AC146-2 and make minor editorial updates only. A number of comments were made about other guidance material, however these were outside the scope of this revision (e.g. SMS implementation for design organisations) and CAA elected to hold the remaining comments for a future revision to AC146-1 rather than delaying AC146-2 any further.

The opportunity has been taken to make several minor updates and notably, the section on "Public Information" has been revised to provide updated guidance relating to the Public Records Act 2005 as it applies to documents approved by a DDH (acting on behalf of the Director) and other records held by a Part 146 Design Organisation.

#### ***Impact on existing delegations***

Advisory Circulars provide a means, but not the only means, of compliance with Civil Aviation Rules. The purpose of AC146-2 is to provide a range of scope statements which may be prescribed under CAR Part 146 Appendix A.1(e).

By publishing AC146-2, CAA does not intend to change the scope of existing delegations (issued by the Director prior to 10 Sep 26).

CAA is progressively transitioning "exclusion-based" delegations to "inclusion-based" delegations, in-line with AC146-2, when those older instruments of delegation expire. The guidance in AC146-2 applies to "inclusion-based" delegations issued from now.

Where an existing "inclusion-based" delegation holder finds a particular scope or condition statement in AC146-2 does not appear on their instrument of delegation, but they believe those types of design changes were within the scope of their existing delegation, they should

contact the Product Certification team for advice. Where there is sufficient evidence of competency the CAA may issue a written authorisation for the approval of relevant design changes until such time as an amendment can be made to their instrument of delegation.

***Scope for “not affected” requirements***

AC146-2 includes several condition statements that limit approvals to design changes where compliance with certain requirements is “unaffected”. As part of the consultation process a respondent asked if a DDH must have a specific statement, in each relevant product and engineering domain, to make a finding of compliance with the associated “unaffected” requirements.

CAR Part 21.505 states that a DDH (acting as the Director) must be satisfied the applicable airworthiness requirements have been met. This power can only be exercised within the scope of their delegation. Applicable requirements are the design and safety standards relevant to the design change (i.e. standards which the design must comply with to ensure aircraft safety). Compliance with applicable requirements may be “unaffected” although some level of substantiation is required.

It is not practical to specify all design changes where “unaffected” requirements are within the scope of a delegation, however CAA has included several domains in AC146-2 where clarification is helpful. In other cases DDHs are expected to apply their professional judgement, act within their own competency, and contact CAA if there is any uncertainty about the scope of their delegation.

This letter will be published on the CAA website, along with other advice previously promulgated to DDHs.

If you have any questions or are seeking any advice relating to these advisory circulars, please get in touch with the Product Certification team. We’re also looking forward to seeing you at the next DDH workshop.



Andrew Rooney  
Head of Product Certification  
Aviation Safety Oversight Group