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Bhutan Civil Aviation Authority

Airworthiness Circular
AC-145-01

File Ref: BCAA/AIR/10/13/1248

Maintenance Away from Approved Location(s)

Issue 01 dated 08 April 2026

1. General

The Circular is issued by the Head of Authority of Bhutan Civil Aviation Authority (BCAA), in exercise of power conferred by the Section 52 of Civil Aviation Act of Bhutan 2016, to communicate safety-related requirements not fully addressed in existing published regulation, or to provide advice, guidance and information on regulation, requirements or standards. The provisions of this Circular are complementary to the requirements of respective BCARs “as amended” and does not supersede or replace the associated regulatory requirements.

Circulars issued may be permanent or interim in nature, and are intended to ensure continued compliance, standardisation, and effective oversight of aviation safety. The compliance with this Circular is mandatory.

2. Purpose

The purpose of this Circular is to establish the requirements for the organizations performing maintenance on unserviceable aircraft or occasional line maintenance under BCAR-145 at an unapproved location as per BCAR-145.A.75(c).

3. Applicability

This Circular is applicable to maintenance organisation approved in accordance with BCAR-145.

4. Cancellation

This is the first Circular issued on the subject.

5. Regulatory References

This Circular relates specifically to BCAR-145 and BCAR-M.



6. Definition and applicability

6.1 BCAR-145. A.75 (c) allows privileges for the maintenance organisation to “maintain any aircraft or any component for which it is approved at any location subject to the need for such maintenance arising either from the **unserviceability of the aircraft** or from the necessity of supporting **occasional line maintenance**, subject to the conditions specified in the exposition”.

6.2 In addition, the Appendix IV to BCAR-M (Class and Rating system), provides some additional flexibility to the case of the B, C and D1 rated organizations (e.g. B/C rated organisation being allowed to carry out maintenance on installed engine/component during base or line maintenance).

6.3 The privilege to perform maintenance in a non-approved location, means that the organisation is issuing a CRS outside the approved locations as per BCAR-145.A.50 (aircraft/engine/component/NDT certificate of release to service as applicable depending from the class rating hold by the organisation).

6.4 In case of any aircraft line or base maintenance activity within Bhutan, aircraft certifying staff shall be qualified to BCAR-66.

6.5 Activity outside the approved locations can be carried in two cases as described in the following paragraphs 7 “Maintenance away from the approved location under approved privileges as per BCAR-145.A.75(c)”.

7. Maintenance away from the approved location under approved privileges as per BCAR-145.A.75(c)

7.1 The procedure(s) related to granting this privileges are approved by the BCAA based upon the ability of the Quality System to deal adequately with the BCAR-145 requirements. Normally this ability cannot be demonstrated at the time of the initial approval, therefore this procedure cannot be included in the MOE nor approved by the BCAA before the first 2 year surveillance cycle has been completed. Exceptions can be granted on a case by case basis for AMOs, who have a justified need to work outside the approved locations immediately after initial approval.

7.2 It must be noted that the fact that an organisation has been granted these privileges should not be understood as if any maintenance task could be performed at any location, or that such locations become “approved locations”.

8. Possible Scenarios

The following scenarios may be considered under approved privileges, meaning that the related maintenance activity outside the approved locations can be carried out based on a control procedure in the MOE:

8.1 **Scenario 1 - Occasional aircraft line maintenance:** applies only to the Ax rated AMO for the need of supporting an A/C operation in a non-approved location for line maintenance (e.g. one-time flight, short term or seasonal contract, flight schedule change, etc.). The use

of this privilege is specifically limited to those cases where the maintenance organisation has a maintenance contract with the Bhutanese customer operator requesting such maintenance outside the approved location and subject to an MOE control procedure which meets the minimum requirements specified in par. 9.2 of this Circular.

8.2 Scenario 2 – A rated AMOs to support an unserviceable aircraft due to an unscheduled event (AOG): applies to the need of aircraft maintenance in the case of an unscheduled/unexpected event, such as an AOG requiring defect rectification, subject to an MOE control procedure which meets the minimum requirements specified in par. 9.3 of this Circular and further subject to the following limitations specific to the A rated AMO:

- The privilege is limited to maintenance organisations having received a work order or having a maintenance contract with the Bhutanese customer/operator requesting such maintenance outside the approved location;
- In the case of Aircraft Base Maintenance activity, prior notification has to be sent to the BCAA before starting the activity, to allow evaluation of the risk associated to the activity and possibly consider an on-site audit after receiving the notification.

8.3 Scenario 3 – B/C rated AMO to support “on-wing” maintenance: applies only to activities carried out “on-wing” following a maintenance work order received from the customer/operator (either scheduled or unscheduled maintenance), subject to an MOE control procedure which meets the minimum requirements specified in par. 9.3 of this Circular and further subject to the following limitations specific to the B/C rated AMO:

- the activity is performed “on-wing” without removal of the component. Nevertheless, the Bx/Cx AMO may temporarily¹ remove a component for maintenance, in order to improve access to that component, except when such removal generates the need for additional maintenance;
- The MOE (of the Bx/Cx AMO):
 - includes procedures for the necessary coordination between the Bx, Cx, as applicable, and the Ax rated maintenance organisation responsible for issuing the aircraft CRS;
 - clearly indicates that the organisation is allowed to perform maintenance, as applicable, on an installed component/engine/APU (“on-wing”), including any associated condition;
 - specifies under which condition such organisation may be allowed to use aircraft maintenance data²;
- where the maintenance task to be performed is only included in the engine/component maintenance data (e.g. it is only in the ESM or CMM) confirmation from the OEM is needed that the task can be carried out outside the workshop environment;
- In case of scheduled maintenance, the repetitive use of the privilege at the same location or for the same customer at different locations is not permitted. In such a case, approval for line maintenance may be obtained for the location(s);
- With regards to Cx rating, this privilege is intended for to those components which are not readily transportable (e.g. thrust reverser, radome, LDG strut, etc.);

1 “temporarily” implies that the component removed is re-fitted on the same a/c during the same maintenance event before final aircraft CRS.

2 EMM/CMM tasks are more detailed and with higher restrictions than any equivalent/similar AMM task supposed to be performed only during aircraft operations. Therefore, in the cases where the B/C rated AMO is intending to use the AMM instead of the relevant EMM/CMM data, the AMO shall liaise with the customer to have a clear indication in the work Order to use the AMM. Such decision cannot be of the B/C rated AMO which shall respectively use EMM/CMM data unless otherwise specified in the work order.

8.4 Scenario 4 – NDT activities under D1 rating: applies only to the D1 rated AMO. This class rating is only necessary for an AMO that carries out NDT as a particular task for another organisation and by definition this activity may need to be carried out at the customer’s facility where the particular aircraft, engine or component is located, subject to an MOE control procedure which meets the minimum requirements specified in par. 9.3 of this Circular and further subject to the following limitations specific of the D1 rated AMO:

- The MOE includes procedures for the necessary coordination between the D1 rated AMO and, as applicable, the Ax, Bx, Cx rated maintenance organisation responsible for issuing the final CRS of the aircraft, engine, component on which the NDT activity is carried out;
- BCAA is not intending to issue BCAR-145 approval to D1 organizations only performing activities outside the approved locations without a permanent facility at the approved address where all applicable BCAR-145 organizations requirements are met, with particular reference to having facilities, personnel, maintenance data, tools and equipment to perform the intended/approved scope of work.

8.5 The following table summarises the acceptable cases of working outside the approved locations not requiring prior approval:

Possible Scenario	Ax		Bx	Cx	D1	MOE control procedure
	Line	Base				
Scenario 1- Occasional aircraft line maintenance	X					Par. 9.2
Scenario 2- A rated AMO to support of an unserviceable aircraft due to an unscheduled event (AOG)	X	X				Par. 9.3
Scenario 3- B/C rated AMO to support “on-wing” maintenance			X	X		Par. 9.3
Scenario 4- NDT activities under D1 rating					X	Par. 9.3

9. Condition to be specified in the exposition.

9.1 When the maintenance organisation wishes to use the privileges described in the previous paragraph, the MOE 1.9 (scope of work) shall make reference to the fact that the maintenance organisation may perform works away from the approved locations, subject to the condition specified in MOE 2.24 (specific maintenance procedure). The MOE 2.24 procedures shall be developed based on the following paragraphs as applicable to the intended scenario and are intended to specify:

- which maintenance tasks are going to be performed under such privilege;
- how the maintenance organisation is going to ensure that the BCAR-145 requirements are met in each case (in particular with regards to adequate facilities, sufficient staff, appropriate certifying staff, availability of tooling and equipment, availability of current maintenance data, adequate planning, release to service procedures, etc.);
- how the maintenance organisation’s quality system is going to monitor compliance with the above requirements.

9.2 Occasional aircraft line maintenance (Scenario 1)

The procedure, shall be based on the following criteria:

- a) Scope of work shall be limited to:
 - aircraft type listed in the MOE 1.9 scope of work and;
 - routine tasks up to and including weekly check (or MOE 1.9 maintenance level whichever is less);
 - trouble shooting and defect rectification
 - any other specific limitation relevant to the organisation class rating, as indicated in par. 8 of this Circular under scenario 1.

- b) A process shall be in place, under the responsibility of the Quality Manager, to show:
 - how the maintenance Manager ensures that the necessary facilities, certifying staff, tools, equipment, material, maintenance data will be made available as necessary and how the maintenance records will be managed;

 - The involvement of the Quality system and its approval for the occasional line maintenance, based on the following criteria:

Use of the non-approved location (consecutive calendar days)	Approval
equal or less than 10	Issued by the Quality manager based either on an on-site audit or a desktop review.
between 10 and 40	Issued by the Quality manager based on an on-site audit.
<p><i>Note 1:</i> When the duration expected for the maintenance is more than 40 days, the approval of a new line station shall be requested to BCAA, to be listed in the MOE 5.3 (list of line maintenance locations as per BCAR-145.A.75 (d)).</p>	
<p><i>Note 2:</i> The check/ schedule permitted under par. 9.2(a) may be performed on the aircraft whensoever the same falls due at the location within the period approved by the Quality Manager.</p>	

- that, when the privilege is used for more than 10 days (second case in the table above), the BCAA is notified of such approval within 7 days from the date of the beginning of the operation. In addition, that a list of all the CRS issued under this procedure shall be made available to BCAA upon request;

- c) The notification shall be formalized using a Form, to be enclosed in the MOE Part 5, including the following minimum information:
 - Customer (s) operator requesting the maintenance activity;
 - Aircraft type(s);



- Scope of the requested maintenance activity;
 - Location;
 - Number and category of certifying staff assigned to support this activity;
 - Quality Manager signature.
- d) In case of scheduled maintenance, the repetitive use of the privilege at the same location or for the same customer at different locations is not permitted. In such a case, approval for line maintenance may be obtained for the location(s).

9.3 Maintenance outside the approved locations other than “occasional line maintenance” (Scenario 2, 3 and 4)

The procedure, shall be based on the following criteria:

- a) The Scope of work shall be limited to:
- aircraft type or components or engines or NDT methods and associated maintenance level as listed in the MOE 1.9 scope of work and;
 - any other specific limitation relevant to the organisation class rating, as indicated in par. 8 of this Circular under scenario 2, 3 and 4, as applicable.
- b) A process shall be in place, under the responsibility of the Quality Manager, including:
- how the Maintenance Manager ensures that the necessary facilities, certifying staff, tools, equipment, material, maintenance data will be made available as necessary and how the maintenance records will be managed;
 - the involvement of the Quality System and its approval for any work away from the approved location, based on a desktop review;
 - availability of a list of all the CRS issued under this procedure to be made available to BCAA upon request;
- In the case scenario 2 is used to perform aircraft base maintenance activities a prior notification shall be sent to the BCAA before starting the activity (as a reference, the minimum information listed in paragraph 9.2 point (c) of this Circular are expected with the notification)

10. Effectivity

This Circular is effective from 08 April 2026.



Head of Authority

DIRECTOR GENERAL
Bhutan Civil Aviation Authority
Paro Bhutan

