
BHUTAN CIVIL AVIATION AUTHORITY



Guidance Material

GM-AIR-09

Guidance on Demonstration of 6/24 Months Maintenance Experience

Issue 01

September 2026

Foreword

This Guidance Material (GM) is explanatory and interpretative material developed by the Bhutan Civil Aviation Authority (BCAA) to assist in the application of the requirements of BCAR-145 and the associated Acceptable Means of Compliance (AMC). It provides examples, best practices, and clarifications to facilitate a consistent understanding and application of the regulatory requirements without introducing additional regulatory obligations.

The scope, applicability, purpose, and entry into force of this GM are provided in para 0.3, 0.4, and 0.5, respectively.

A handwritten signature in black ink, appearing to read 'Lamgchok', with a horizontal line underneath.

Head of Authority

DIRECTOR GENERAL
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Paro Bhutan

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0. Introduction

0.1 Revision History

Issue	Issue date	Summary of Change
Issue 01	04 September 2026	First issue

0.2 Definitions & Abbreviations

Abbreviations	
AMC	Acceptable Means of Compliance
AML	Aircraft Maintenance Licence
AMO	Aircraft Maintenance Organisation
BARNs	Bhutan Air Navigation Regulations
BCAA	Bhutan Civil Aviation Authority
BCAR	Bhutan Civil Aviation Requirements
AMTO	Approved Maintenance Training Organisation
AOG	Aircraft On Ground
C/S	Certifying Staff
CC/S	Component Certifying Staff
EASA	European Union Aviation Safety Agency
EU	European Union
ESM	Engine Shop Manual
FAA	Federal Aviation Administration (U.S.A)
GM	Guidance Material
ILAC	International Laboratory Accreditation Cooperation
IORS	Internal Occurrence Reporting System
MOA	Maintenance Organisation Approval
MOAP	Maintenance Organisation Approval Procedures
MOE	Maintenance Organisation Exposition
MOR	Mandatory Occurrence Reporting
NDT	Non-Destructive Testing
NDI	Non-Destructive Inspection
OEM	Original Equipment Manufacturer
PMA	Parts Manufacturer Approval
PPB	Principal Place of Business
SRM	Structural Repair Manual
S/S	Support Staff
STCH	Supplemental Type Certificate Holder
TCCA	Transport Canada Civil Aviation
TCH	Type Certificate Holder
WH	Working Hours

0.3 Scope & Applicability

The Bhutan Civil Aviation Authority (BCAA) is the competent authority responsible for the final approval of these maintenance organisations and for establishing procedures detailing BCAR-145 applications and approvals are managed.

This user guide is applicable to applicants for BCAR-145 approval and Approved Maintenance Organizations (AMOs) holding or seeking approval under BCAR-145 (hereinafter referred to as "maintenance organizations"). It provides guidance to assist maintenance organizations and BCAA inspectors in demonstrating and assessing compliance with BCAR-145.

The provisions of this user guide are complementary to the requirements of BCAR-145 requirement "as amended" and does not supersede or replace the associated regulatory requirements.

0.4 Purpose

This user guide is designed to be used by maintenance organization and the BCAA when:

- The maintenance organization is:
 - Establishing procedures for compliance to the requirement of having all Certifying Staff (C/S)¹ and/or base maintenance Support Staff (S/S) involved in at least 6 months of actual relevant aircraft or component maintenance experience in any consecutive 2-year period.
- BCAA is:
 - Evaluating the compliance of the maintenance organisation to the requirement of having all Certifying Staff (C/S) and/or base maintenance Support Staff (S/S) involved in at least 6 months of actual relevant aircraft or component maintenance experience in any consecutive 2-year period.

0.5 Entry into Force

This User Guide comes into force 30 days after publication on the BCAA website. Within this time frame the maintenance organisation shall assess the impact of this User Guide on the organisation's procedures and when relevant, propose a revision of the affected procedures to the BCAA.

The entry into force date of this User Guide does not supersede the need to comply with any other entry into force date(s) established by applicable regulatory requirements.

0.6 Associated Instructions

BCAA has developed associated instructions including Guidance, Checklists, Forms and Templates, that detail specific matters which have to be considered as an integral part of this GM. The organisations must refer to BCAA website (www.bcaa.gov.bt) for further information and necessary guidance.

0.7 Communication

All documents and correspondences between the maintenance organisation and BCAA shall be in the English/Dzongkha language. The official email is airworthiness@bcaa.gov.bt.

¹ Certifying staff means Aircraft, engine, component and NDT certifying staff

1. Requirements

1.1 Applicable requirement BCAR-145.A.35 (c).

The maintenance organisation shall ensure that all certifying staff (C/S) and base maintenance support staff (S/S) are involved in at least six months of actual relevant aircraft or component maintenance experience² in any consecutive two year period.

1.2. Maintenance Organisation Exposition.

The maintenance organisation, is required to detail in the MOE chapter 3.4 (refer to the GM-AIR-08 BCAR-145 Maintenance Organisation Exposition Guidance), a procedure describing how the C/S and S/S shall demonstrate the compliance with the above requirement and how the control of this requirement is ensured.

This procedure shall be:

- established for:
 - issuing an initial individual BCAR-145 C/S - S/S individual authorisation;
 - renewing an individual BCAR-145 C/S - S/S individual authorisation.
- met by any holder of BCAR-145 C/S - S/S individual authorisation issued under any rating, as applicable depending on the scope of approval hold by the maintenance organisation and in particular for:
 - A rating (A1, A2, A3 or A4), Aircraft certifying staff and/or support staff;
 - C rating (from C1 to C22), Components certifying staff;
 - B rating (B1, B2 or B3), Engines, APU certifying staff;
 - D1 rating (any NDT method), specialised services certifying staff.
- Compliant with the duration and nature of experience criteria detailed below.

² "involved in actual relevant aircraft or component maintenance" means that the person has worked in an aircraft or component maintenance environment and has either exercised the privileges of the certification authorisation and/or has actually carried out maintenance on at least some of the aircraft type or aircraft group systems specified in the particular certification authorisation

2. Definition of Experience

The 6 months maintenance experience in 2 years shall be understood as consisting of two elements, duration and nature of the experience. The minimum to meet the requirements for these elements may vary depending on the size and complexity of the aircraft /engine/component and type of operation and maintenance.

The experience acquired/recorded on a specific aircraft/component/engine/APU type may also be used to demonstrate having or maintaining the experience on a similar aircraft/component/engine/APU type. When the BCAR-145 AMO intends to use the privilege of “similar aircraft/component/engine/APU” for the demonstration of the 6/24 months requirement, the MOE chapter 3.4 shall include, as applicable, definitions of similar³ aircraft/engines/components/APUs types relevant to the scope of work held by the maintenance organisation, (refer to the GM-AIR-08 BCAR-145 Maintenance Organisation Exposition Guidance).

The experience must be gained in an BCAR-145 AMO (or a suitably agreed alternative). However, experience gained on a similar A/C, Engine, component technology in a similar environment may be considered acceptable subject to BCAA approval.

2.1. Duration.

C/S and/or S/S shall demonstrate to have acquired within a maintenance organisation, in any consecutive 2-year period:

- 6 months working with the same maintenance organisation; or
- 6 months split up into different blocks, working within the same or in different maintenance organisations.

2.2.Nature.

C/S and/or S/S shall demonstrate maintenance **activity** performed (and/or supervised and/or released to service), within an approved maintenance organization, on a comprehensive combination of different **tasks types** (i.e. Servicing, inspection, troubleshooting, repairing, modifying, removal/installation, etc.).

³ Definition of “similar” aircraft/engines/components/APUs need to be agreed with the BCAA by inclusion in the MOE

3. Acceptable experience

3.1. Duration.

A recording of a total of 180 tasks at different dates in the 2 years period would be the minimum expected record to demonstrate the “duration”⁴ requirement (but not necessarily the “nature of experience” requirement, which shall meet the criteria of the following chapter). The 180 tasks may be replaced by a record of 100 working days of maintenance experience in accordance with the privileges. In this case each recorded day is intended to be a full working day, which for example means for base maintenance activity around 7/8 working hours per day. The duration should be recorded in days or half-days.

A person may have at the same time one or more BCAR-145 C/S - S/S individual authorisation (i.e. being B1 aircraft C/S on 3 different A/C types, or being at the same time C6 and C14 C/S on different components P/N, etc.). He/she will have to record a minimum of 180 tasks (or 100 working days), regardless the number/types of BCAR-145 C/S - S/S individual authorisation hold.

For any Ax, Bx, Cx and D1 rating, a maximum of 20% of the required experience duration, may be replaced by the following activities when relevant to the scope of the BCAR-145 C/S - S/S individual authorisation:

- Maintenance training as an instructor/assessor;
- Maintenance technical support/engineering;
- Maintenance management/planning.

Having recorded 180 tasks or 100 days only during the first year of the 2-year period cannot be considered as acceptable. The experience shall be spread over the period to avoid a too long interval without activity.

In order to demonstrate compliance of the above requirements, the maintenance organisation's quality system is requested to issue a document or to have an electronic system in place (refer to section 4.1 ") where the **number of performed tasks (or working days)** shall be summarised and recorded for each C/S and/or S/S.

⁴ For an initial or renewal of a C/S and S/S BCAR-145 individual authorisation a duration credit can be taken from an OJT, the practical element of an A/C type training or component training.

3.2. Nature.

The activities considered relevant for maintenance experience, as applicable to BCAR-145 C/S - S/S individual authorisation held, are functional/operational test, service and ground handling, removal/installation, minimum equipment list, trouble shooting, modification, repair and inspection.

The tasks recorded need to be representative of the nature of the experience by:

- being related to a combination of activities which is appropriate to the individual authorisation hold (i.e. only records of service and ground handling for an aircraft B1 C/S is not acceptable, etc.)
- being representative of each of the BCAR-145 C/S - S/S individual authorisations held according to the criteria stated in the following chapter.
- being not limited to simple tasks (i.e. a bulb replacement for an aircraft B2 C/S or wheel exchange for an aircraft B1 C/S, standardisation of equipment or system performance checks for NDT C/S, etc.).
- In addition, having recorded a majority of identical tasks or tasks not covering the overall individual authorisation privileges cannot be considered as acceptable. For instance, a Component C/S authorised to release under the C14 rating wheels, brakes and landing gears, should demonstrate experience on wheels, brakes and landing gears to keep the full C14 scope of authorization

In order to demonstrate compliance of the above requirements, the maintenance organisation's quality system is requested to issue a document or to have an electronic system in place (refer to section 4.1 ") where the **type of activity/ tasks** shall be summarised and recorded for each C/S and/or S/S.

3.2.1. Aircraft certifying staff and/or support staff

The following specific criteria, shall be considered to identify an acceptable "nature of experience":

- For category A, the experience shall include exercising the privileges, by means of performing tasks related to the authorisation (hold or intended to be granted) on at least one aircraft type for each subcategory (i.e. A1, A2, A3, A4). This means tasks as mentioned in AMC 145.A.30(g), including servicing, component changes and simple defect rectifications;
- For category B1, B2 and B3, for every aircraft type rating included in the authorisation (hold or intended to be granted), the experience shall be on that particular aircraft or on a "similar aircraft"⁵ within the same subcategory (i.e. B1.1, B1.2, B1.3, B1.4);
- In order to ensure the experience is representative of the B2 qualification when granting an initial authorization to B2 category, only the avionics/electrical tasks that cannot be done by a B1 (e.g replacing bulbs and lights) should be recorded as B2.
- For category C, the experience shall cover at least one of the aircraft type endorsed in the authorisation (hold or intended to be granted);
- For a combination of categories (i.e. B1.1 + B2, B1.1 + C, etc.), the experience shall include some activities in each category (hold or intended to be granted).
- When the organisation is using the privilege of "similar aircraft" as described in section 2 of this user guide a minimum of 30% of the experience duration (tasks or working days as applicable) needs to be recorded for each group of similar aircraft identified in the MOE 3.4.

⁵ Two aircraft can be considered as "similar" when they have similar technology, construction and comparable systems, which means equally equipped with all the following (as applicable to the licence category):

- Propulsion systems (piston, turboprop, turboprop, turboshaft, jet-engine or push propellers), and
- Flight control systems (only mechanical controls, hydromechanically powered controls or electromechanically powered controls); and
- Avionic systems (analogue systems or digital systems); and
- Structure (manufactured of metal, composite or wood).

3.2.2. Components, engines, specialised services certifying staff.

The following specific criteria, shall be taken into account, to identify an acceptable nature of experience:

- Cx rating (from C1 to C22), Components certifying staff: the experience shall include exercising the privileges, by means of performing tasks or exercising the certification privileges of the authorization on each of the C rating authorised/intended to be authorised;
- Bx rating (B1, B2 or B3), Engines certifying staff: the experience shall include exercising the privileges, by means of performing tasks or exercising the certification privileges of the authorization on each of the B rating authorised/intended to be authorised;
- D1 rating (any NDT method), Specialised services certifying staff: the experience shall include exercising the privileges, by means of performing tasks of the authorization on the NDT methods authorised/intended to be authorised. Also refer EN4179 for the D rating experience requirements.
- When the organisation is using the privilege of "similar component/Engine/APU" as described in

section 2 of this user guide a minimum of 30% of the experience duration (tasks or working days as applicable) needs to be recorded for each group of similar component/engine/APU identified in the MOE 3.4.

3.3. Credit of experience.

For an initial BCAR-145 C/S - S/S individual authorisation, the following credit of experience requirements may be considered:

- For Ax rating C/S and S/S: having passed a type training (theoretical and practical) in an approved BCAR-147 organisation within the year preceding the issue of the BCAR-145 C/S-S/S individual authorisation supersedes the need for demonstration of 6/24 months maintenance experience on the specific aircraft type plus any other similar aircraft A/C;
- For Cx rating CC/S: having passed a component training within the year preceding the issue of the BCAR-145 C/S individual authorisation supersedes the need for Demonstration of 6/24 months maintenance experience for this particular component or a component from the same family and same technology;
- For Bx rating CC/S: having passed an engine/APU training within the year preceding the issue of the BCAR-145 C/S individual authorisation supersedes the need for demonstration of 6/24 months maintenance experience for this particular engine/APU or an engine/APU from the same family and same technology.
- For D1 rating C/S: having passed a training and examination for an NDT method as detailed in the EN 4179, within the year preceding the issue of the BCAR-145 C/S individual authorisation supersedes the need, for demonstration of 6/24 months maintenance experience for this particular method to be added to the BCAR-145 C/S individual authorisation.

3.4. Lack of recent experience demonstration/record.

In the case it is not possible to demonstrate by records the duration and/or nature of experience according to the criteria established in this user guide, the BCAR-145 C/S - S/S individual authorisation cannot be granted or renewed, unless the candidate C/S and/or S/S:

- (a) Acquires the missing elements of duration (i.e. missing number or tasks or missing days) and/or nature (i.e. missing T/S or MEL tasks for a B1 aircraft maintenance certifying staff, missing tasks on landing gears maintenance for C14 C/S, etc.) of experience. If the BCAR-145 AMO is unable to provide this possibility due to missing workload/activity, it may be acceptable that the person completes such missing elements. The missing elements may be completed by BCAR-145 AMO issuing/renewing BCAR-145 C/S - S/S individual authorisation, at another BCAR-145 AMO, or at a maintenance organisation not having BCAR-145 approval;
- (b) Attends a complete aircraft type training or component/ engine/APU training according to the previous section “Credit of experience. However, in the case of the renewal of the BCAR-145 C/S - S/S individual authorisation, this option **cannot be used as a standard mean to replace** experience demonstration but should only be used under extraordinary circumstances such as “a person coming from a period of inactivity”, “a maintenance organisation having no maintenance workload for a period of time”, “etc.”; in fact, the preferred solution in case of lack of recent experience should be always to acquire the missing part according to the previous point (a);
- (c) Limited to the case of an Ax rated maintenance organisation, with a scope of work limited to minor line maintenance such as for example transit, daily, weekly. Depending from the amount of activity carried out by the maintenance organisation, it may be difficult for each of the line maintenance C/S to demonstrate the necessary “nature” of experience covering the full privileges. In such case it may be accepted, that the BCAR-145 C/S individual authorisation is issued or renewed as applicable, introducing limitations relevant to the missing nature of experience (i.e. authorisation excluding defects rectification, etc.). Such limitation may be removed by complying with the point (a) or (b)

above, as necessary.

When all the C/S available for a certain aircraft type is endorsed with limitations in the BCAR-145 C/S individual authorisation, The maintenance organisation is responsible for analysing the possible impact on the scope of approval and for continued compliance with BCAR-145.

4. Maintenance Experience records

4.1 Individual logbook

The compliance of the 6/24 months maintenance experience requirement shall be documented in an appropriate manner to demonstrate that both the “duration” and “nature of experience” meet the required standard.

A standard template for recording the maintenance experience is provided in the *GM-AIR-11 Aircraft Maintenance Engineer's Logbook*, available on the BCAA website.

The experience may be recorded/ documented in any other individual log book or recording system (which may be an automated one).

When the maintenance organisation is able to develop an automated system, the automatically generated logbook needs to contain the same level of information provided in the *GM-AIR-11 Aircraft Maintenance Engineer's Logbook*, either:

- directly in the logbook printout, or;
- Indirectly by retrievable information (e.g. to be found in the work packages referred in the logbook itself).

Tasks should be representative and may consist of the following⁶:

- *Routine tasks i.e AMM inspections*
- *Troubleshooting*
- *Defect rectification*
- *Accomplishment of AD's / SB's*
- *Modifications – implementation*
- *Use of MEL / CDL*
- *Damage repair & assessment / Use of SRM (Metal & Composite, where applicable)*

The final decision to accept such system, considering the above mentioned guidance material is left to the BCAA.