

GUERNSEY ADVISORY CIRCULARS (GACs)



GAC AIR-18



**AMO OPTION 2
ADDITIONAL
GUIDANCE**



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1 Purpose

This Circular provides information and guidance on the requirements for maintenance organisation approval under GAR Part 145 Subpart D 'Option 2'.

2 Related laws, regulations and requirements

This Circular relates to GAR Part 145.

No rights can be derived from this document. For exact details please refer to The Air Navigation (Bailiwick of Guernsey) Law, 2012 (The Law). In case of conflict between this guidance document and the Law, the latter shall prevail.

3 Definitions

Definitions, in the context of this GAC shall have the meanings listed in GAR Part 1 (Definitions, Abbreviations and Units of Measurement).



4 Maintenance Facilities

4.1 Base Maintenance

For base maintenance of aircraft, hangars should be both available and large enough to accommodate aircraft on planned base maintenance. Where the hangar is not owned by the organisation, it may be necessary to establish proof of tenancy.

In addition, sufficiency of hangar space to carry out planned base maintenance should be demonstrated by the preparation of a projected aircraft hangar visit plan which should be updated on a regular basis.

For aircraft component maintenance, aircraft component workshops should be large enough to accommodate the components on planned maintenance.

4.2 Line Maintenance

For line maintenance of aircraft, hangars are not essential but it is recommended that access to hangar accommodation can be demonstrated for usage during inclement weather for minor scheduled work and lengthy defect rectification.

However, in all cases the nature of the maintenance task should be considered and if required appropriate accommodation should be made available.

4.3 Engine and Component Workshops

- (a) For engine and component maintenance, the workshops should be large enough to accommodate the engines or components on maintenance.
- (b) Engine and component workshop structures should prevent the ingress of rain, hail, ice, snow, wind and dust etc. Workshop floors should be sealed to minimise dust generation.

4.4 Office Accommodation

Appropriate office accommodation should be provided for the incumbents, whether they are management, planning, technical records, quality or certifying staff, such that they are able to carry out their designated tasks in a manner that contributes to good aircraft maintenance standards.

In addition, aircraft maintenance staff should be provided with an area

where they may study maintenance instructions and complete maintenance records in a proper manner.

4.5 Environmental Protection

- (a) Protection from the weather elements relates to the normal prevailing local weather elements that are expected throughout any twelve-month period. Aircraft hangar and aircraft component workshop structures should be to a standard that prevents the ingress of rain, hail, ice, snow, wind and dust etc. Aircraft hangar and aircraft component workshop floors should be sealed to minimise dust generation.
- (b) Hangars used to house aircraft together with office accommodation should be such as to ensure the working environment permits personnel to carry out work tasks in an effective manner.
- (c) Temperatures should be maintained such that personnel can carry out required tasks without undue discomfort.
- (d) Dust and any other airborne contamination should be kept to a minimum and not be permitted to reach a level in the work task area where visible aircraft/component surface contamination is evident.
- (e) Lighting should be such as to ensure each inspection and maintenance task can be carried out effectively.
- (f) Noise levels should not be permitted to rise to the point of distracting personnel from carrying out inspection tasks. Where it is impractical to control the noise source, such personnel should be provided with the necessary personal protective equipment to stop excessive noise causing distraction during inspection tasks.
- (g) Where a particular maintenance task requires the application of specific environmental conditions different to the foregoing, then such conditions should be observed. Specific conditions are identified in approved maintenance instructions.
- (h) The working environment for line maintenance should be such that the particular maintenance or inspection task can be carried out without undue distraction. It therefore follows that where the working environment deteriorates to an unacceptable level in respect of temperature, moisture, hail, ice, snow, wind, light, dust/other airborne contamination, the particular maintenance or inspection tasks should be suspended until satisfactory conditions are re-established.

- (i) For base, line, engine and component maintenance where dust/other airborne contamination results in visible surface contamination, all susceptible systems should be sealed until acceptable conditions are reestablished.

4.6 Storage and Segregation

- (a) Storage facilities for serviceable aircraft components should be clean, well-ventilated and maintained at an even dry temperature to minimise the effects of condensation. Manufacturers' storage recommendations should be followed for those aircraft components identified in such published recommendations.
- (b) Storage racks should be strong enough to hold aircraft components and provide sufficient support for large aircraft components such that the component is not distorted during storage.
- (c) All aircraft components, wherever practicable, should remain packaged in protective material to minimise damage and corrosion during storage.
- (d) Appropriate measures should be taken to segregate the storage of components where the likelihood of cross-contamination of physical and or electro/magnetic influence may occur.

5 Equipment, Tools, and Materials

5.1 Availability of Tools and Equipment

- (a) Sufficient tools and equipment should be determined for the intended scope of approval for consideration by the Director. It is advisable that this determination should be done in an appropriate manner providing the basis and visibility for the tools and equipment inventory.
- (b) It will be necessary to show that all required tools and equipment as specified in the applicable approved maintenance data can be made available when needed.
- (c) The availability of equipment and tools means permanent availability, except in the case of any tool or equipment that is so rarely needed that its permanent availability is not necessary. In such cases appropriate formal arrangements shall be made for the acquisition of such tooling or equipment in advance of its being required. Where these tools and equipment are required to be controlled in terms of servicing or calibration, evidence shall be available prior to their use that such controls have been undertaken.
- (d) An organisation approved for base maintenance should have sufficient aircraft access equipment and inspection platforms/docking such that the aircraft may be properly inspected.

5.2 Specialised Tools and Equipment

Where the manufacturer specifies the use of a particular tool or equipment that tool or equipment should be used, unless otherwise agreed by the Director in a particular case via a procedure specified in the maintenance organisation exposition to use alternative tooling/equipment.

5.3 Control of Tools and Equipment

- (a) All tools and equipment that are required to be controlled in terms of servicing or calibration by virtue of being necessary to measure specified dimensions and torque figures etc, should be clearly identified and listed in a control register including any personal tools and equipment that the organisation agrees can be used.
- (b) The control of such tools and equipment requires that the organisation has a procedure to inspect/service and, where appropriate, calibrate such items on a regular basis and indicate to users that the item is within any inspection or service or calibration time-limit.

- (c) A clear system of labelling all tooling, equipment and test equipment is therefore necessary giving information on when the next inspection or service or calibration is due and if the item is unserviceable for any other reason where it may not be obvious. A register should be maintained for all precision tooling and equipment together with a record of calibrations and standards used.
- (d) Inspection, service or calibration on a regular basis should be in accordance with the equipment manufacturers' instructions except where the organisation can show by historical calibration and/or servicing results that a different time period is appropriate in a particular case.

5.4 Materials

The necessary material to perform the scope of work means readily available raw material and aircraft components in accordance with the manufacturer's recommendation unless the organisation has an established spares provisioning procedure.

6 Maintenance Data

6.1 General

A maintenance organisation should have access to and use all applicable maintenance data relevant to the organisation's scope of approval.

6.2 Manufacturers' Maintenance Data

A maintenance organisation should have access to and use all applicable current maintenance data that is relevant to the organisation's scope of approval.

6.3 Customer Supplied Maintenance Data

Where an operator or customer provides maintenance data, this data should be verified for applicability and revision status. These arrangements should be identified in the work order or maintenance contract. It is not necessary to continue to hold such provided data when the work is completed, however records of its use should be retained.

6.4 Maintenance Data Resources

The maintenance organisation should retain relevant copies of maintenance data applicable to the scope of approval at approved locations where the maintenance is conducted. This will inevitably mean that certain documents will need to be duplicated where as others need only be made available at particular approved locations.

6.5 Control and Availability

- (a) To keep maintenance data up to date, a procedure should be in place to verify the amendment status of all data, and maintain a check that all amendments are being received by having a subscription to a document amendment scheme. Where several copies of a document are held the procedures should ensure that these are all maintained to the correct revision status.
- (b) It is important that maintenance data is made available to personnel maintaining aircraft and that the data should be available in close proximity to the aircraft being maintained for supervisors, mechanics and certifying staff to study. Additionally, consideration should be given to situations where maintenance, repair and or defect rectification is being undertaken away from the approved sites. In these circumstances it may be advisable to ensure that those involved in such maintenance activities have appropriate access to any required data through a person

responsible for maintenance data within the organisation. These arrangements should be formalised and be available during the hours of the maintenance activities.

- (c) Where computer systems are used, the number of computer terminals should be sufficient in relation to the size of the work programme to enable easy access, unless the computer system can produce paper copies. Where microfilm or microfiche readers/printers are used, a similar requirement is applicable.

6.6 Complex Maintenance Tasks

Where complex maintenance tasks are undertaken using a workcard system to record the maintenance activity, it is advisable that the maintenance data should be transcribed onto the workcards or worksheets. This should be subdivided into clear stages to ensure a record of the accomplishment of the maintenance task.

Of particular importance is the need to differentiate and specify, when relevant, disassembly, accomplishment of task, reassembly and testing. In the case of a lengthy maintenance task involving a succession of personnel to complete such task, it may be necessary to use supplementary workcards or worksheets to indicate what was actually accomplished by each individual person.

6.7 Inaccurate Maintenance Data

- (a) A procedure should ensure that when maintenance personnel discover inaccurate, incomplete or ambiguous information in the maintenance data, they should record the details. The procedure should then ensure that the maintenance organisation notifies the problem to the author of the maintenance data in a timely manner, and reported through the organisation's internal reporting system. A record of such communications to the author of the maintenance data should be retained by the organisation until such time as the Design Approval Holder (DAH) has clarified the issue by amending the maintenance data.
- (b) The procedure in (a) should be specified in the Maintenance Organisation Exposition (MOE).
- (c) The procedure should also address the need for a practical demonstration by the engineer to the appropriate Quality / Compliance Monitoring personnel for a proposed modification to the maintenance instruction. The quality personnel should approve (or not approve) the modified maintenance instruction and ensure that the DAH is informed of the modified maintenance instruction. There should be traceability of the complete process from start to finish, ensuring that the relevant maintenance instruction clearly identifies the modification. Modified maintenance instructions should only be used in the following circumstances:
 - (1) Where the DAH's original intent can be carried out in a more practical or more efficient manner;
 - (2) Where the DAH's original intent cannot be achieved by following the maintenance instructions. For example, where a component cannot be replaced following the original maintenance instructions;
 - (3) For the use of alternative tools / equipment.

7 Production Planning

7.1 Structure and Responsibilities

Depending on the amount and complexity of work generally performed by the maintenance organisation, the planning system/function may range from a very simple procedure to a complex organisational set-up including dedicated planning personnel in support of the production function. The production planning function includes two principal stages:

- (a) Scheduling of maintenance.
- (b) Maintenance activities (work in progress).

7.2 Maintenance Scheduling

Scheduling the maintenance work ahead ensures that it will not adversely interfere with other work as regards the availability of all necessary personnel, tools, equipment, material, maintenance data and facilities. It follows that an understanding of the operator's maintenance input plan is essential to undertake this task. Direct liaison with the operator's technical representative should be undertaken at all relevant stages of this planning function.

7.3 Maintenance Activities

During maintenance work, organising maintenance teams and shifts and provide all necessary support to ensure the completion of maintenance without undue time pressure specifically on individuals. When establishing the production planning procedure, consideration should be given to the following:

- (a) logistics;
- (b) inventory control;
- (c) size of accommodation;
- (d) man-hours estimation;
- (e) man-hours availability;
- (f) preparation of work;
- (g) hangar availability;
- (h) environmental conditions (access, lighting standards and cleanliness);
- (i) co-ordination with internal and external suppliers, etc;
- (j) scheduling of safety-critical tasks during periods when staff are likely to be most alert.

7.4 Human Performance

Limitations of human performance, in the context of planning safety related tasks, refers to the upper and lower limits, and variations, of certain aspects of human performance (Circadian rhythm / 24 hours body cycle should be one of the considerations) which personnel should be aware of when planning work and shifts.

Planning personnel should have an awareness of human performance issues and fatigue risks. This can often be enhanced through a close working relationship with maintenance personnel.

Additionally, it is most important that safety related tasks are identified in the applicable maintenance programme, and that these tasks are readably identifiable throughout the planning and maintenance functions.

7.5 Shift Working - Personnel Handovers

There should be planned shift overlaps sufficient to allow for a process of exchanging information between outgoing and incoming persons and a place for such exchanges to take place. The primary objective of the changeover information is to ensure effective communication at the point of handing over the continuation or completion of maintenance actions. Effective task and shift handover depends on three basic elements:

- (a) The outgoing person's ability to understand and communicate the important elements of the job or task being passed over to the incoming person.
- (b) The incoming person's ability to understand and assimilate the information being provided by the outgoing person.
- (c) The planning of task orientations and document control for tasks that are likely to overlap shifts should take into consideration the need for effective handovers.

8 Personnel Authorisations

8.1 The approval of a maintenance organisation requires the control of the organisation's (company-issued) authorisations of its certifying staff. This should be under the authority of its Quality / Compliance Monitoring System.

Control of company authorisations are conventionally the responsibility of the Quality / Compliance Monitoring Manager.

8.2 The maintenance organisation should maintain procedures for training, competency assessment, and issuance of authorisations appropriate to the scope of its approval, in its Maintenance Organisation Exposition (MOE) or Quality / Compliance Monitoring Manual.

The process should demonstrate compliance with the applicable regulations as the basis for the management of company authorisations issued to its certifying staff.

Note: Where an organisation uses certifying staff issued with differing ICAO member state licences, (for example EASA, FAA, UKCAA, SACAA), then the process of evaluating any competence differences, together with any additional training required should be clearly defined in the exposition.

8.3 A record of each authorisation issued should be retained in the individual's personal training file.

Typically, this should contain the following information (but not limited to):

- Passport
- Qualifications
- Aircraft Maintenance Engineer (AME) Licence
- Experience (copy of AME logbook)
- Training records; including:
 - Basic training
 - Type training
 - Continuation / recurrent training
 - Safety Management Systems (SMS) training
 - Human Factors training
 - GAR / 2-REG training
 - Company training (MOE / SOPs)
- Company Authorisations (including scope)
- Competency Assessments



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