

GUERNSEY ADVISORY CIRCULAR (GACs)



GAC AIR-8



Remote Survey

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First Issue

February 2023

Guernsey Advisory Circulars (GACs) are issued to provide advice, guidance and information on standards, practices and procedures necessary to facilitate the application and processing of applications for services related to the Guernsey Aircraft Register.

They are not in themselves law or a regulation but may amplify provisions of the laws and regulations, including the Guernsey Aviation requirements, or provide practical guidance. Since GAC's are non-binding, regulated persons may choose alternative means to comply with the guidance. In this case, however, they lose the presumption of compliance provided by the circular and need to demonstrate to the Office of the Director Civil Aviation (ODCA) that they do comply with the law.

The definitive version of GACs is on the States of Guernsey website <http://www.cidca.aero/guernsey-aviation-requirementsgov.gg/> which should be viewed to establish the latest issue.

Enquiries regarding the content of this publication should be addressed to the Director of Civil Aviation, Guernsey Airport, Airport Terminal Building, La Villiaze, Forest, Guernsey, GY8 ODS.

Processing of applications will be done by the Guernsey Aircraft Registry, which operates as '2-REG'. For further information consult <http://www.2-reg.com> or send a message to info@2-reg.com.

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1 - Purpose

This Circular provides guidance on Remote Surveys for Initial, Renewal and Export Certificates of Airworthiness (CofA) and the presentation of an aircraft for investigation by the ODCA, 2-REG.

2 - Related laws, regulations and requirements

This GAC relates to GAR Part 21.175.

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

Remote technology is well established. Historically, while it has not been used widely for aviation regulatory oversight or certification activities, stable (video) technologies are available and reliable. Having the ability for easy travel and visits to facilities, it had not previously been pursued aggressively by ICAO contracting states. Under the COVID 19 circumstances, states had to aggressively increase the use of this capability and have learned that experience with the technology matters, and the capability to use it effectively continues to improve.

As the recent COVID-19 global health emergency required the limitation of travel, 2-REG expanded its Certification oversight to allow the use of Remote Airworthiness Surveys. Utilising commonly available technology, such as phone and computer video/audio, scanned documentation, and other means, to meet its regulatory responsibilities and stakeholder needs.

5 - Remote Survey

A remote survey is conducted to the same compliance standard as an on-site survey but requires alternative methods of accessing the aircraft records and gaining visual confirmations. Clients should note that experience has shown that a remote survey typically takes longer than an on-site survey. Therefore, 2-REGs preferred surveillance method is to facilitate an on-site survey with a Designated Airworthiness Inspector attending the aircraft.

Notwithstanding the above, 2-REG continues to learn lessons from new and innovative methods of delivering our safety oversight remotely. Accordingly, 2-REG is committed to

continually develop new ways of working and initiate processes that have potential positive benefits to our clients beyond the COVID19 situation.

Therefore, 2-REG will continue to develop its Remote Survey¹ capability and provide stakeholder flexibility in anticipation of the promulgation of ICAO SARP's on the Remote Performance of Regulatory Certification and Oversight Activities. For the foreseeable future, 2-REG will offer Remote Survey capability on the following basis:

Remote Survey will be considered in locations where there is:

- Geo-political instability.
- Security concerns.
- Travel and public health restrictions/emergencies.

In addition to the above, remote surveys can also be requested by 2-REG clients. These requests will be considered on a case-by-case basis by 2-REG in conjunction with the Office of the Director of Civil Aviation (ODCA).

NOTE: Notwithstanding the above, the ODCA reserves the right, as a safety regulator and based on reasonable grounds to insist that an on-site survey is conducted.

The following provides a list of items that 2-REG will consider when deciding whether to facilitate a Remote Survey; the list is not exhaustive:

- The aircraft history with 2-REG.
- The aircraft continuing airworthiness management environment.
- The aircraft operational environment.
- The aircraft available safety data.
- Facility available to facilitate a remote survey.
- An individual's competence to conduct the physical element of the survey under the direction of a Designated Inspector.

[1. Remote survey capability includes the option of Hybrid Survey i.e., utilising a local 2-REG Technical Representatives at a location inaccessible to a 2-REG Designated Inspector.]

6 - Records inspection requirements:

- The applicant shall prepare the records in accordance with GAR 21.175.
- The applicant shall send or make available the aircraft records to the 2-REG Designated Inspector in a digital format.
- If the applicant does not hold digital aircraft records, this must be highlighted to 2-REG at the earliest opportunity so that alternative arrangements can be made a sufficient time ahead of the survey being required.

7 - Physical inspection requirements:

- The aircraft will be required to be available on the ground during periods of the remote survey identified by the Designated Inspector.
- The individual presenting the aircraft must be able to send photos within a timeframe requested by the Designated Inspector.
- The individual presenting the aircraft must be able to send live video while the survey is being conducted.
- The aircraft should be in the following condition where possible (please discuss with your allocated Inspector if any of the following cannot be complied with)
 - Aircraft located in a hangar; electrical/hydraulic power available.
 - Flaps in the down position, any undercarriage fairings, equipment/cargo/APU bays, engine cowlings open (or removed).
 - Access equipment (stage, platforms, lifts etc.) should be adequate to gain access to aircraft.
 - Sufficient lighting, with addition of portable lighting if necessary.

Note: it is the applicant's responsibility to ensure that the individual appointed to conduct the physical survey has considered and been briefed on all necessary Health and Safety aspects prior to the survey.

8 - Conduct requirements:

Once the survey date has been agreed, the Designated Inspector will contact the applicant to confirm detailed arrangements, including:

- Setting out the aircraft records and photographs/video that are required and to agree the means of sending/receiving these.
- The exact dates when the aircraft will be required on the ground.
- Agreeing which method of remote communication is preferred during the survey.
- From the remote survey start date until the completion of the survey, the applicant must be available to answer questions relating to the continued airworthiness of the aircraft.
- Further documentation, images/video may well be requested during the conduct of the survey at any time.

END