

GUERNSEY ADVISORY CIRCULARS (GACs)



GAC AIR-17



**AMO
OPTION 2
APPROVAL**



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Director of
Civil Aviation

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First Issue

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Enquiries regarding the content of this publication should be addressed to the Office of the Director of Civil Aviation, Guernsey Airport, Airport Terminal Building, La Villiaze, Forest, Guernsey, GY8 0DS.

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 information and guidance regarding the application for approval of an Aircraft Maintenance Organisation (AMO) by the Director.

The guidance in this Circular pertains to Option 2 approval applications for an AMO in accordance with GAR Part 145 Subpart D; A standalone approval by the Director undertaking a full assessment of the AMO to the requirements of GAR Part 145.

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 Introduction

- 4.1 The intent of this Circular is to guide applicants during the application for a approval of a GAR Part 145 Aircraft Maintenance Organisation (AMO).
- 4.2 The initial application, approval, and administration of an organisation, shall be in accordance with the requirements of GAR Part 145 as applicable.
- 4.3 For a GAR Part 145 organisation, the Maintenance Organisation Exposition (MOE) will define the scope and capability of the organisation ensuring that visibility is maintained of all functional activities.

The approval of the organisation and acceptance of its MOE by the Director, provides a mechanism to record the required standards of aircraft maintenance that the approval holder must comply with.

5 Application (initial and renewal)

5.1 Initial application for the Option 2 approval of an AMO, should be made by the applicant in electronic format via the 2-REG Application Portal at: www.2-reg.com/application

5.2 On receipt and acceptance of the application, 2-REG will allocate a unique reference number. Any subsequent correspondence and additional supporting documentation as outlined in this Circular should quote the allocated reference number.

5.3 The applicant should review this Circular to assist their completion of the application for an AMO approval and the submission of the MCM.

Note: A checklist to assist the development of the MOE is included in Appendix A of this Circular.

5.4 The MOE draft copy should be submitted in electronic format, accompanied by the following supporting documentation as a minimum;

- Details of all Nominated Post Holders (NPH) including a Curriculum Vitae (CV) for each candidate, and for the Accountable Manager.
- An internal compliance audit of the organisation by the Quality Manager or Compliance Monitoring Manager to verify that all applicable GAR requirements have been met.
- A Safety Management System (SMS) Manual to define how the organisation will identify its hazards and manage its risks.
- A Management of Change (MOC) documenting how the organisation shall implement any necessary changes to ensure compliance with applicable GAR requirements. If an applicant does not already hold a maintenance approval, a project plan may be provide instead of an MOC document.

5.5 Application for the renewal of an AMO approval should be made by the applicant in electronic format via the 2-REG Application Portal at: www.2-reg.com/application, and payment of the appropriate application fee.

6 Application and Approval Process

- 6.1 ICAO Annex 8 prescribes appropriate requirements for the approval of an organisation in accordance with defined standards. The issuance of a GAR Part 145 approval by the Director is dependent upon the applicant demonstrating a need for Option 2 approval, and compliance with the applicable requirements.
- 6.2 2-REG has implemented the ICAO 'five phase process' for assessment of an organisation for an approval, and its subsequent issuance. The assessment involved will be carried out by an assigned Project Manager and Airworthiness Inspector/s designated by the Director to act on their behalf.
- 6.3 For each organisation, the application and approval process is organised across the five phases in the following sequence:

Phase 1: Pre-application;

This phase establishes the applicant's understanding of the approval process and the regulatory requirements. It should be noted that it is the applicant's responsibility to be aware of the content and eligibility of the requirements prior to initiating an application.

At this stage the applicant is required to present their reasons or need for an Option 2 approval so that 2-REG can understand the vision and objectives of the organisation. This should be a high-level justification and include an organisational chart detailing the intended management structure including post holders. It should also outline the operational plan for the next few years. If acceptable, the applicant will be advised to make a formal application.

Note: 2-REG will review the presentation and only provide guidance on matters relating to regulatory compliance or the application process.

Phase 2: Formal application;

This phase requires the formal application for an approval to be submitted by the applicant to the 2-REG, accompanied by the required documentation.

Submission of a formal application implies that the applicant is aware of the applicable regulations, able to show the method of compliance, and is prepared for in-depth evaluation of the organisation.

Upon receipt of an application, 2-REG will designate a Project Manager to manage the application and assign an Airworthiness Inspector to

support the approval process.

At this stage an invoice shall be provided to the applicant prior to proceeding with the subsequent application phases.

Phase 3: Document evaluation;

This phase involves the detailed examination by 2-REG of all documentation and manuals provided by the applicant, to establish that every aspect required by the applicable regulations is included.

In order to facilitate this phase of the certification process, the applicant should have coordinated all aspects of the development of the required documentation with the assigned Project Manager prior to the submission of the formal application.

Phase 4: Demonstration and inspection;

This phase includes the inspection (audit) by 2-REG of the organisation's facilities, processes, procedures, resources and operational control of the activities that they are intending to conduct to ensure that the applicant's proposed procedures are effective and that the resources are actually in place to meet applicable requirements.

The audit may also include interviews with personnel to ensure that the procedures are understood. This is particularly relevant to management staff to ensure that their responsibilities to the Safety and Compliance Monitoring (Quality) Management Systems are in place.

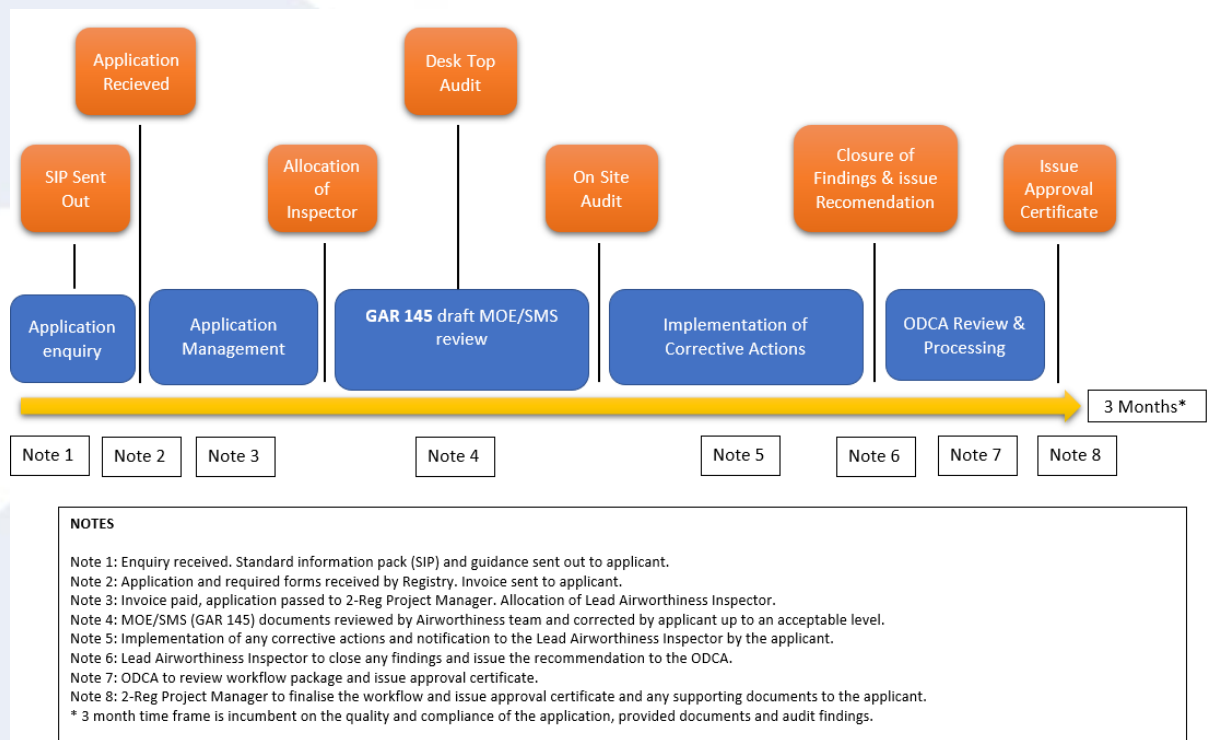
The Project Manager will identify those activities where such demonstration will be required.

Phase 5: Certification (Approval);

This phase commences after the 2-REG assigned Project Manager determines that all assessment processes have been satisfied, and that the applicant has demonstrated compliance with the applicable requirements and is capable of fulfilling their responsibilities for conducting a safe operation.

The assigned Airworthiness Inspector will submit a recommendation to the Director for the issue of the approval.

6.4 Applicants should consider the following process timeline, from an initial application to issuance of a formal approval;



6.5 Following the issuance of an approval, the Director will be responsible for surveillance of the organisation. Periodic inspections to ensure the organisation's continued compliance with applicable regulations, limitations, and provisions of its scope of approval are delegated to the designated Airworthiness Inspector/s for ongoing oversight of the organisation.

7 Nominated Post Holders

- 7.1 The approval of an organisation shall require the nomination of senior personnel, identified as Nominated Post Holders (NPH) reporting directly to the organisation's Accountable Manager, with responsibilities for ensuring compliance with the applicable requirements.

Note: GAC GEN-5 provides guidance on the Nominated Post Holders qualification and experience requirements.

- 7.2 The proposed NPH will be accepted by the Director if after determination the nominee is deemed suitable.
- 7.3 For a GAR Part 145 approved organisation, an NPH shall be required for each of the following positions;

NPH Position	Required
Maintenance Management 'Maintenance Manager'	✓
Compliance Monitoring 'Quality Manager'	✓
Safety Management 'Safety Manager'	✓

8 Accountable Manager

- 8.1 The approval of an organisation shall require an Accountable Manager who has corporate authority and responsibility for ensuring that the activities conducted under the organisation's approval are performed to the standards required.

Note: GAC GEN-4 provides guidance regarding the Accountable Manager that should be referred to.

- 8.2 The proposed Accountable Manager will only be accepted by the Director after determination that the nominee is suitable.
- 8.3 The organisation's MOE should include a statement of commitment by the Accountable Manager. The following is a suggested statement, any alterations to this statement must not affect the intent of this guidance:

"This Maintenance Organisation Exposition (MOE) is provided to meet the requirements of the Guernsey Aviation Requirements (GAR) Part 145 Subpart D Option 2 approval issued by the Bailiwick of Guernsey Director of Civil Aviation (DCA) and administered by the Guernsey Aircraft Registry (2-REG).

These procedures are approved by the undersigned and must be complied with, as applicable, in order to ensure that all maintenance activities are carried out on time and to an approved standard.

It is accepted that these procedures do not override the necessity of complying with any new or amended regulation published from time to time where these new or amended regulation are in conflict with these procedures.

It is understood that the DCA will approve this MOE whilst it is satisfied that the procedures are being followed and the work standard is maintained. It is also understood that the DCA reserves the right to suspend, vary or revoke this approval if it has evidence that these procedures are not being followed and the standards not upheld".

9 MOE content

- 9.1 Appendix A provides a checklist to serve as compliance cross-reference to GAR Part 145, aimed at Option 2 applications.

Organisations developing an MOE should refer to GAR 145.123 in particular.

- 9.2 The purpose of the MOE checklist is to assist applicants with a view to ensuring that MOEs submitted to 2-REG for approval by the Director, have been developed in a standardised fashion, have visibility of compliance with GARs, and include the elements required to ensure that the subject aircraft can be effectively managed and maintained in an airworthy condition.
- 9.3 Whilst it is intended that the checklists establish a standardised content for an MOE, in their development the applicant should take into account the nature of included material and any operator-related material which may be depended on. As a consequence, this may alter the formatting of the document. Where the applicant has deviated from this format, completing the checklist will assist in establishing continued visibility of compliance with GARs.
- 9.4 It is not intended that the checklists should constrain or prevent the applicant from including required information. In cases where the applicant has included additional material or other means of compliance, the applicant should include explanation with their MOE to justify any changes.
- 9.5 Organisations should clearly identify their scope of work for either line or base maintenance. 'Line maintenance' refers to limited maintenance for the aircraft suitable to be carried out whilst the aircraft remains in the air operations environment. 'Base maintenance' refers to any maintenance of the aircraft other than line maintenance.

10 Safety management and compliance monitoring

10.1 A Safety Management System (SMS) should be implemented to meet the specific needs of the organisation. As each organisation differs, the SMS should be proportionate to the size and complexity of the organisation.

Note: GAC GEN-2 provides guidance regarding SMS that should be referred to.

10.2 A Quality / Compliance Monitoring System (CMS) should be implemented; compliance with GAR Part 145 will rely on the organisation's CMS being acceptable and effective.

Note: GAC GEN-3 provides guidance regarding CMS that should be referred to.

10.3 Whether an organisation is defined as 'small' will be dependent on various factors such as the experience of the organisation, resources employed, and the complexity or number of aircraft managed and/or under contract with air operators.

10.4 Applicants should liaise with 2-REG at an early stage to determine the type and scale of SMS and CMS required. Organisations that are structured as a 'small organisation' may have independent quality / compliance oversight arrangements in place, which may be acceptable to the Director.

Appendix A Maintenance Organisation Exposition Checklist

Applicants may refer to the following checklist to guide the development of their MOE:

GAR ref	MOE requirement - guidance	MOE para
145.123 (a)(1)	Include a statement signed by the Accountable Manager confirming that the MOE and any associated manuals that defines the organisation's compliance with GAR Parts 145 and 43 will be complied with at all times. When the Accountable Manager is not the CEO of the organisation then such CEO shall countersign the statement.	
145.123 (a)(2)	Define the organisation's safety and quality policy.	
145.123 (a)(3)	Specify the title(s) and name(s) of the senior person(s) referenced in 145.105(b) that are approved by the Director.	
145.123 (a)(4)	Define the duties and responsibilities of the senior person(s) specified in 145.123(a)(3) including matters on which they may deal directly with the Director on behalf of the organisation.	
145.123 (a)(5)	Include an organisation chart showing associated lines of responsibility of the senior person(s) specified in 145.105(b).	
145.123 (a)(6)	Include a list of certifying staff.	
145.123 (a)(7)	Provide a general description of manpower resources.	
145.123 (a)(8)	Include a general description of the facilities located at each address specified in the organisation's approval certificate.	
145.123 (a)(9)	Specify the organisation's scope of work relevant to its extent of approval.	
145.123 (a)(10)	Define the notification procedure required by 145.55 and 145.127 for changes to the organisation.	
145.123 (a)(11)	Define the MOE amendment procedure encompassing 145.123 that constitutes the management part of the MOE.	
145.123 (a)(12)	Define the organisation's procedures as required by 145.103 to 145.127 inclusive.	
145.123 (a)(13)	Describe the organisation's SMS as required by Subpart B.	
145.123 (a)(14)	Provide a list of organisations, if appropriate, as specified in 145.11(b).	
145.123 (a)(15)	Define, when applicable, the additional procedures for complying with an operator's maintenance procedures and specific requirements.	
145.123 (b)	Note that selected information as specified in 145.123(a) may be kept as separate documents or on separate electronic data	

GAR ref	MOE requirement - guidance	MOE para
	files, subject to the management part of the MOE containing a clear cross reference to such documents or electronic data files.	
145.123 (c)	Specify that the MOE and any subsequent amendments shall be acceptable to the Director and made available to those that are required to hold it.	



END