



AERONAUTICAL CIRCULAR - AC/ALD-LIC/01/2023

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**REVIEW OF AML(S) ISSUED UNDER CONVERSION PROVISIONS – AML(S)
ISSUED BY NETHERLANDS CIVIL AVIATION AUTHORITY AND ACTION
THEREOF**

1. Subject

BCAA decision to address the effect of BCAA licences affected in view of suspension of Netherlands EASA Part-66 Aircraft Maintenance Licence (AML) with First Type Rating Endorsement.

2. Reference Publications

- a. Bahrain Civil Aviation Law, Article 18
- b. ANTR Part II
- c. ANTR 66

3. Applicability

Holders of Bahraini AML issued on the basis of conversion provisions with BCAA, limited to the of Netherlands EASA Part-66 AML.

4. Background

Bahrain Civil Aviation Affairs policy for issuance of Aircraft Maintenance Licences is stipulated in ANTR 66.A.0, ANTR 66.A.70 and CAP 09, Chapter 4.3, which states that "The licences issued by ICAO contracting States may be recognised by the Kingdom of Bahrain and converted to a Bahraini licence".

The ANTR and CAP continues to elaborate that "The Licence Without Type Rating does not permit the holder to exercise maintenance certification privileges leading to issuing Certificate of Release to Service (CRS), unless the licence is appropriately endorsed with the aircraft type rating. Furthermore, for the first type endorsement, the applicant should have completed an On-the-Job Training, duly assessed by a designated assessor".

BCAA has issued AML endorsed with type rating under the conversion provisions, the Netherlands EASA Part-66 endorsed with type rating. Recently, holders of Netherlands Part-66 licences (issued under the EASA regulation) have received



AERONAUTICAL CIRCULAR – AC/ALD-LIC/01/2023 (CONTD...)

letters from the Human Environment and Transport Inspectorate, ILT of Netherlands informing them of suspension of the type rating privileges, and replacement of the type rated endorsed AML with basic category AML due to the reason that the organization conducted the required OJT were not under the oversight of Netherlands CAA system.

The Netherlands CAA are currently holding an investigation to reassess the affected licences by this decision, outcome of the investigation will be communicated to the licence holders at a later stage.

5. Action by BCAA

Subsequent to the number of inquiries received from licence holders and maintenance organisations, the BCAA has conducted an analysis of the impact of the temporary suspension decision taken by the Netherlands CAA on Bahraini licence holders and consequential effect on the maintenance organisations, and it was found that it has an adverse effect on both the aforementioned personnel and organisations.

Hence the BCAA is proposing following:

To study, evaluate and to apply appropriate consideration, for the affected licenses (suspended type rating privileges of licenses issued by Netherlands CAA) and its privileges as valid, subject to submission of the following by organisations / licence holders and subsequent acceptance by BCAA:

- Approval document / Details of the OJT privileges granted to the MTO and / or the 145 organisations by the National Aviation Authority or EASA.
- Letter of authorisation / acceptance of the OJT by the Netherlands CAA or KIWA Register at the time of training commencement.
- Certificates of recognition for completion of relevant type rating courses (Theoretical and Practical).
- Certificate of completion of the relevant OJT training and On Job Training logbook or equivalent document.

Note: Licence holders include holders of Bahraini AML issued on basis of Netherlands CAA EASA AML affected by this decision and serving in other states.



AERONAUTICAL CIRCULAR – AC/ALD-LIC/01/2023 (CONTD...)

The submission of the above and its consideration with respect to an individual (not employed by any Bahraini aircraft operator and / or the organization) holding such licenses will be addressed on case-to-case basis upon receipt of request by BCAA.

Upon review of the above and satisfactory outcome and acceptance by the BCAA a decision may be arrived on the continuation of licence privileges issued originally with type rating endorsements until the final investigation outcome by the Netherlands CAA; later action may be decided in due course.



A/Undersecretary for Civil Aviation Affairs

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