

COVID-19 NOTIFICATION OF TEMPORARY DIFFERENCES FORM

With reference to State Letter AN/11/55-20/50, the CCRD sub-system has been created in the existing Electronic Filing of Differences (EFOD) system to capture any differences to Certification and Licensing ICAO Standards that may arise from mitigation measures due to the spread of COVID-19.

What

It is recognized that States may need to take flexible approaches to enable service providers and personnel to maintain the validity of their certificates, licenses and other approvals as a result of the COVID-19 pandemic. This form allows a State to identify those temporary differences.

Why

This is necessary to support States in meeting their obligations under Article 38, 39 and 40 of the Convention, in order to conduct international operations where certificates and licenses differ to the minimum Standards in the Annexes. It also allows the sharing of information on whether notified differences will be recognized or accepted by other States during this period.

When

These temporary measures apply until 31 March 2021. This date is subject to review.

Who

There is no restriction on who can fill out the form. However, it may only be submitted by the national continuous monitoring coordinator or an authorized user from a Member State, who are responsible for ensuring the accuracy of the information provided.

How

Standards specifically related to certification and licensing of personnel from which States may deem it necessary to differ are listed in this form. The specific Annex reference and associated Standard is presented in columns 1 and 2. The information required in each subsequent column is as follows:

Column 3: Details of Difference.

Summarize the difference to the certification and licensing Standards. Reference the related regulatory documents where appropriate.

Column 4: Remarks.

Provide your rationale for these differences and the details of any conditions and mitigations where necessary.

Column 5: Recognition of other State Differences.

Indicate whether your State will recognize or accept the validity of other States' certificates and licenses based on their temporary differences submitted via the CCRD. For simplicity this may be stated as an exclusion (what other States temporary differences are not acceptable) rather than listing what would be acceptable.

Please submit this Form by email to ops@icao.int.

Annex & Reference Number	Generic	Details of Difference	Remarks – to include:	Recognition of other State Differences
	Alleviations measures		a. Rationale	
	Annex Standard or Recommended Practice		b. Conditions/Mitigations	
Annex 1 1.2.4.4.1	<p>1.2.4.4.1 The period of validity of a Medical Assessment may be extended, at the discretion of the Licensing Authority, up to 45 days.</p> <p><i>Note. — It is advisable to let the calendar day on which the Medical Assessment expires remain constant year after year by allowing the expiry date of the current Medical Assessment to be the beginning of the new validity period under the proviso that the medical examination takes place during the period of validity of the current Medical Assessment but no more than 45 days before it expires.</i></p>	<p>TEMPORARY DIFFERENCE BY COVID-19:</p> <p>The State of XXXXX will extend the period of validity of a Medical Assessment up to 3 months starting the 10 of March 2020</p>	<p>A risk analysis was developed based on the Bow Tie tool, based on this, it was decided to establish some mitigation measures</p> <p>It was decided to use a regional strategy based on the possibility that we can return to a "Normal" operations in a 3 months.</p> <p>The State of XXXXX, prior to issuing any extension of validity periods, will assess each applicant’s medical record (carried out by the Civil Aviation medical assessor), in order to minimize as much as possible any level of risk.</p> <p>All personnel subject to the exemption, have to carry an attachment to the license and medical certificate which refers to the exemption granted.</p>	<p>The State of XXXXX will recognize the validity of the certificates of others States as well as, the temporary differences adopted, based on risk mitigation or alleviation measures taken by those States</p>
Annex 1 1.2.5.1.2	<p>1.2.5.1.2 A Contracting State, having issued a licence, shall ensure that other Contracting States are enabled to be satisfied as to the validity of the licence.</p> <p><i>Note 1. — Until 2 November 2022, the maintenance of competency of flight crew or remote flight crew members, engaged in commercial air transport operations, may be satisfactorily established by demonstration of skill during proficiency flight checks completed in accordance with Annex 6.</i></p>	<p>TEMPORARY DIFFERENCE BY COVID-19:</p> <p>The State of XXXXX will extend the period of validity of a License up to 3 months starting the 10 of March 2020</p>	<p>A risk analysis was developed based on the Bow Tie tool, based on this, it was decided to establish some mitigation measures</p> <p>It was decided to use a regional strategy based on the possibility that we can return to a "Normal" operations in a 3 months.</p> <p>The rationale behind this difference is the safety operational measures needed due to COVID 19 since most FSTD, training devices or ATOs are not available and most air operators or providers have suspended operations, it is</p>	<p>The State of XXXXX will recognize the validity of the certificates of others States as well as, the temporary differences adopted, based on risk mitigation or alleviation measures taken by those States</p>

Annex & Reference Number	Generic	Details of Difference	Remarks – to include:	Recognition of other State Differences
	Alleviations measures		a. Rationale	
	Annex Standard or Recommended Practice		b. Conditions/Mitigations	

	<p>Note 1.— <i>As of 3 November 2022, the maintenance of competency of flight crew members, engaged in commercial air transport operations, may be satisfactorily established by demonstration of skill during proficiency flight checks completed in accordance with Annex 6.</i></p> <p>Note 2.— <i>Until 2 November 2022, maintenance of competency may be satisfactorily recorded in the operator’s records, or in the flight crew member’s personal log book or licence.</i></p> <p>Note 2.— <i>As of 3 November 2022, maintenance of competency may be satisfactorily recorded in the operator’s records, or in the flight crew or the remote flight crew member’s personal log book or licence.</i></p> <p>Note 3.— <i>Until 2 November 2022, flight crew members may, to the extent deemed feasible by the State of Registry, demonstrate their continuing competency in FSTDs approved by that State.</i></p> <p>Note 3.— <i>As of 3 November 2022, flight crew and remote flight crew members may, to the extent deemed feasible by the State of Registry, or Licensing Authority of</i></p>		<p>not possible for license/certificate holders to undergo checks or assessments to re-validate ratings/certificates at the moment.</p> <p>If an organization is subject to this exemption, the certificate holder by means of their SMS (or other means) must present a risk assessment to demonstrate and document how they will manage the associated risk in relation with the time extension granted and to identify additional mitigation measures to ensure the effectiveness of safety risks controls.</p> <p>The State of XXXXX reserves the right to approve or denied the request based on the analysis of the information provided by the operator.</p> <p>All personnel subject to the exemption, have to carry an attachment to the license and medical certificate which refers to the exemption granted.</p>	
--	--	--	--	--

Annex & Reference Number	Generic	Details of Difference	Remarks – to include:	Recognition of other State Differences
	Alleviations measures		a. Rationale	
	Annex Standard or Recommended Practice		b. Conditions/Mitigations	
	<p><i>the State of the Operator, respectively, demonstrate their continuing competency in FSTDs approved by that State.</i></p> <p><i>Note 4. — See the Manual of Criteria for the Qualification of Flight Simulation Training Devices (Doc 9625).</i></p> <p><i>Note 5. — See the Manual of Procedures for Establishment and Management of a State’s Personnel Licensing System (Doc 9379) for guidance material on the development of a risk assessment process.</i></p>			
Annex 6 Part 1 9.4.1.1	<p>9.4 Qualifications</p> <p><i>Note. — See the Manual of Procedures for Establishment and Management of a State’s Personnel Licensing System (Doc 9379) for guidance of a general nature on cross-crew qualification, mixed-fleet flying and cross-credit.</i></p> <p>9.4.1 Recent experience — pilot-in-command and co-pilot</p> <p>9.4.1.1 The operator shall not assign a pilot-in-command or a co-pilot to operate at the flight controls of a type or variant of a type of aeroplane during take-off and</p>	<p>TEMPORARY DIFFERENCE BY COVID-19: (2 options)</p> <p>The State of XXXXX will extend the validity of those who lose their recent experience from April 1 to on June 30, 2020, up to 3 additional months, and for those that their recent experience expire from July 1 to September 30, 2020, the State of XXXXX will grant an additional 2 months</p>	<p>A risk analysis was developed based on the Bow Tie tool, based on this, it was decided to establish some mitigation measures including two options to give the operator more flexibility</p> <p>It was decided to use a regional strategy based on the possibility that we can return to a "Normal" operations in a 3 months lapse and another one in 6 months, hence the options.</p> <p>The operator must also develop by means of their SMS a risk analysis that allows them to identify additional mitigation measures of to ensure the effectiveness of safety risks controls</p> <p>Each certificate holder who wants to use this extension period must</p>	<p>The State of XXXXX will recognize the validity of the certificates of others States as well as, the temporary differences adopted, based on risk mitigation or alleviation measures taken by those States</p>

Annex & Reference Number	Generic	Details of Difference	Remarks – to include:	Recognition of other State Differences
	Alleviations measures		a. Rationale	
	Annex Standard or Recommended Practice		b. Conditions/Mitigations	
	landing unless that pilot has operated the flight controls during at least three take-offs and landings within the preceding 90 days on the same type of aeroplane or in a flight simulator approved for the purpose.		<p>demonstrate and document how they will manage the associated the risk in relation with the time extension granted.</p> <p>The State of XXXXX will publish within its Ops Specs (in others) or in another official document, a temporary revision showing the exemptions granted.</p>	
Annex 6 Part 1 9.4.2.1	<p>9.4.2 Recent experience — cruise relief pilot</p> <p>9.4.2.1 The operator shall not assign a pilot to act in the capacity of cruise relief pilot in a type or variant of a type of aeroplane unless, within the preceding 90 days that pilot has either:</p> <p>a) operated as a pilot-in-command, co-pilot or cruise relief pilot on the same type of aeroplane; or</p> <p>b) carried out flying skill refresher training including normal, abnormal and emergency procedures specific to cruise flight on the same type of aeroplane or in a flight simulator approved for the purpose, and has practised approach and landing procedures, where the approach and landing procedure practice may be performed as the pilot who is not flying the aeroplane.</p>	<p>TEMPORARY DIFFERENCE BY COVID-19: (2 options)</p> <p>For those who lose their recent experience from April 1 to on June 30, 2020, the State grants a 3 month additional extension, and for those that their recent experience expire from July 1 to September 30, 2020, the State of XXXXX will grant an additional 2 months.</p>	<p>A risk analysis was developed based on the Bow Tie tool, based on this, it was decided to establish some mitigation measures including two options to give the operator more flexibility</p> <p>It was decided to use a strategy based on the possibility that we can return to a "Normal" operations in a 3 months lapse and another one of 2 months after the first lapse, hence the two options.</p> <p>The operator must also develop by means of their SMS a risk analysis that allows them to identify additional mitigation measures of to ensure the effectiveness of safety risks controls</p> <p>Each certificate holder who wants to use this extension period must demonstrate and document how they will manage the associated the risk in relation with the time extension granted.</p> <p>The State of XXXXX will publish within its Ops Specs (in others) or in another official document, a</p>	<p>The State of XXXXX will recognize the validity of the certificates of others States as well as, the temporary differences adopted, based on risk mitigation or alleviation measures taken by those States</p>

Annex & Reference Number	Generic	Details of Difference	Remarks – to include:	Recognition of other State Differences
	Alleviations measures		a. Rationale	
	Annex Standard or Recommended Practice		b. Conditions/Mitigations	
			temporary revision showing the exemptions granted.	
Annex 6 Part 1 9.4.4.1	<p>9.4.4 Pilot proficiency checks</p> <p>9.4.4.1 The operator shall ensure that piloting technique and the ability to execute emergency procedures is checked in such a way as to demonstrate the pilot's competence on each type or variant of a type of aeroplane. Where the operation may be conducted under instrument flight rules, the operator shall ensure that the pilot's competence to comply with such rules is demonstrated to either a check pilot of the operator or to a representative of the State of the Operator. Such checks shall be performed twice within any period of one year. Any two such checks which are similar and which occur within a period of four consecutive months shall not alone satisfy this requirement.</p> <p><i>Note 1. — Flight simulation training devices approved by the State of the Operator may be used for those parts of the checks for which they are specifically approved.</i></p>	<p>TEMPORARY DIFFERENCE BY COVID-19:</p> <p>(2 options) For those who lose their competence from April 1 to June 30, 2020, the State will grant an additional 3 month extension, the pilot must also perform 3 takeoffs and 3 landings before the first flight with passengers and for those who their OPC expires from July 1 to September 30, 2020, the State will grant an additional 2 months. The pilot needs also to perform at least 3 takeoffs and landings or a 2 hour training in a simulator type C or D</p>	<p>A risk analysis was developed based on the Bow Tie tool, based on this, it was decided to establish some mitigation measures including two options to give the operator more flexibility</p> <p>It was decided to use a regional strategy based on the possibility that we can return to "Normal" operations in a 3 months lapse and another one of 2 months after the first lapse, hence the two options.</p> <p>Regarding the proficiency checks, we took into account some risk analysis that presented us with some difficulties that operators will face at this time, such as; unable to perform OPC due to unavailability of Inspectors or access to training facilities in foreign countries, also some worries about training environments such as simulators that could expose even more the training pilots. In addition, inspectors of the CAAs also could not have also access to these training centers and they would lose also their your competence.</p> <p>Each certificate holder who wants to use this extension must demonstrate and document how the potential risk associated with the extension of the time period</p>	<p>The State of XXXXX will recognize the validity of the certificates of others States as well as, the temporary differences adopted, based on risk mitigation or alleviation measures taken by those States</p>

Annex & Reference Number	Generic	Details of Difference	Remarks – to include:	Recognition of other State Differences
	Alleviations measures		a. Rationale	
	Annex Standard or Recommended Practice		b. Conditions/Mitigations	
	<i>Note 2. — See the Manual of Criteria for the Qualification of Flight Simulation Training Devices (Doc 9625).</i>		<p>will be evaluated and mitigated.</p> <p>The operator must also develop by means of their SMS a risk analysis that allows them to identify additional mitigation measures of to ensure the effectiveness of safety risks controls</p> <p>Each certificate holder who wants to use this extension period must demonstrate and document how they will manage the associated the risk in relation with the time extension granted.</p> <p>The State of XXXXX will publish within its Ops Specs (in others) or in another official document, a temporary revision showing the exemptions granted.</p>	
Annex 6 Part 2 3.9.4.2	<p>3.9.4.2 Recent experience — pilot-in-command</p> <p>The operator shall not assign a pilot to act as pilot-in-command of an aeroplane unless that pilot has made at least three take-offs and landings within the preceding 90 days on the same type of aeroplane or in a flight simulator approved for the purpose.</p>	<p>TEMPORARY DIFFERENCE BY COVID-19: (2 options)</p> <p>The State of XXXXX will extend the validity of those who lose their recent experience from April 1 to on June 30, 2020, an additional 3 months, and for those who lost their recent experience from July 1 to September 30, 2020, the State of XXXXX will grant an additional 2 months</p>	<p>A risk analysis was developed based on the Bow Tie tool, based on this, it was decided to establish some mitigation measures including two options to give the operator more flexibility</p> <p>It was decided to use a regional strategy based on 60 or 30 days extension depending on the expiration date for the executive and general aviation.</p> <p>Each owner or pilot must establish additional measures or mitigations to help ensure the effectiveness of the safety controls and additional risk</p>	<p>The State of XXXXX will recognize the validity of the certificates of others States as well as, the temporary differences adopted, based on risk mitigation or alleviation measures taken by those States</p>

Annex & Reference Number	Generic	Details of Difference	Remarks – to include:	Recognition of other State Differences
	Alleviations measures		a. Rationale	
	Annex Standard or Recommended Practice		b. Conditions/Mitigations	
Annex 6 Part 2 3.9.4.3	3.9.4.3 Recent experience — co-pilot The operator shall not assign a co-pilot to operate at the flight controls of an aeroplane during take-off and landing unless that pilot has made at least three take-offs and landings within the preceding 90 days on the same type of aeroplane or in a flight simulator approved for the purpose.	TEMPORARY DIFFERENCE BY COVID-19: (2 options) The State of XXXXX will extend the validity of those who lose their recent experience from April 1 to on June 30, 2020, an additional 3 months, and for those who lost their recent experience from July 1 to September 30, 2020, the State of XXXXX will grant an additional 2 months	A risk analysis was developed based on the Bow Tie tool, based on this, it was decided to establish some mitigation measures including two options to give the operator more flexibility It was decided to use a regional strategy based on 90 or 60 days extension depending on the expiration date for the executive and general aviation. Each owner or pilot must establish additional measures or mitigations to help ensure the effectiveness of the safety controls and additional risk	The State of XXXXX will recognize the validity of the certificates of others States as well as, the temporary differences adopted, based on risk mitigation or alleviation measures taken by those States
Annex 6 Part 3 7.4.1.1	7.4 Qualifications <i>Note. — See the Manual of Procedures for Establishment and Management of a State’s Personnel Licensing System (Doc 9379) for guidance of a general nature on cross-crew qualification, mixed-fleet flying and cross-credit.</i> 7.4.1 Recent experience — pilot-in-command and co-pilot 7.4.1.1 The operator shall not assign a pilot-in-command or a co-pilot to operate at the flight controls of a type or variant of a type of a helicopter during take-off and landing unless that pilot has operated the	TEMPORARY DIFFERENCE BY COVID-19: (2 options) The State of XXXXX will extend the validity of those who lose their recent experience from April 1 to June 30, 2020, an additional 3 months extension, and for those that their recent experience expire from July 1 to September 30, 2020, the State of XXXXX will grant an additional 2 months	A risk analysis was developed based on the Bow Tie tool, based on this, it was decided to establish some mitigation measures including two options to give the operator more flexibility It was decided to use a regional strategy based on the possibility that we can return to a "Normal" operations in a 3 months lapse and another one of 2 months after the first lapse, hence the two options. The operator must also develop by means of their SMS a risk analysis that allows them to identify additional mitigation measures of to ensure the effectiveness of safety risks controls Each certificate holder who wants to use this extension period must demonstrate and document how	The State of XXXXX will recognize the validity of the certificates of others States as well as, the temporary differences adopted, based on risk mitigation or alleviation measures taken by those States

Annex & Reference Number	Generic	Details of Difference	Remarks – to include:	Recognition of other State Differences
	Alleviations measures		a. Rationale	
	Annex Standard or Recommended Practice		b. Conditions/Mitigations	
	flight controls during at least three take-offs and landings within the preceding 90 days on the same type of helicopter or in a flight simulator approved for the purpose.		<p>they will manage the associated the risk in relation with the time extension granted.</p> <p>The State of XXXXX will publish within its Ops Specs (in others) or in another official document, a temporary revision showing the exemptions granted.</p>	
Annex 6 Part 3 7.4.3.1	<p>7.4.3 Pilot proficiency checks</p> <p>7.4.3.1 The operator shall ensure that piloting technique and the ability to execute emergency procedures is checked in such a way as to demonstrate the pilot's competence on each type or variant of a type of helicopter. Where the operation may be conducted under IFR, the operator shall ensure that the pilot's competence to comply with such rules is demonstrated to either a check pilot of the operator or to a representative of the State of the Operator. Such checks shall be performed twice within any period of one year. Any two such checks which are similar and which occur within a period of four consecutive months shall not alone satisfy this requirement.</p> <p><i>Note 1.— Flight simulation training devices approved by the State of the Operator may be used for those parts of the checks for which they are specifically approved.</i></p>	<p>TEMPORARY DIFFERENCE BY COVID-19:</p> <p>(2 options) For those who lose their competence from April 1 to June 30, 2020, the State of XXXXX will grant an additional 3 month extension, the pilot must also perform 3 takeoffs and 3 landings before the first flight with passengers and for those who their OPC expires from July 1 to September 30, 2020, the State will grant 2 additional months. The pilot needs also to perform a least 3 takeoffs and landings or a 2 hour training in a simulator type C or D</p>	<p>A risk analysis was developed based on the Bow Tie tool, based on this, it was decided to establish some mitigation measures including two options to give the operator more flexibility</p> <p>It was decided to use a regional strategy based on the possibility that we can return to "Normal" operations in a 3 months lapse and another 2 months extension, hence the two options.</p> <p>Regarding the proficiency checks, we took into account some risk analysis that presented us with some difficulties that operators will face at this time, such as; unable to perform OPC due to unavailability of Inspectors or access to training facilities in foreign countries, also some worries about training environments such as simulators that could expose even more the training pilots. In addition, inspectors of the CAAs also could not have also access to these training centers and they would lose also their competence</p>	<p>The State of XXXXX will recognize the validity of the certificates of others States as well as, the temporary differences adopted, based on risk mitigation or alleviation measures taken by those States</p>

Annex & Reference Number	Generic	Details of Difference	Remarks – to include:	Recognition of other State Differences
	Alleviations measures		a. Rationale	
	Annex Standard or Recommended Practice		b. Conditions/Mitigations	

	<p><i>Note 2.— See the Manual of Criteria for the Qualification of Flight Simulation Training Devices (Doc 9625), Volume II — Helicopters.</i></p>		<p>Each certificate holder who wants to use this extension must demonstrate and document how the potential risk associated with the extension of the time period will be evaluated and mitigated.</p> <p>The operator must also develop by means of their SMS a risk analysis that allows them to identify additional mitigation measures of to ensure the effectiveness of safety risks controls</p> <p>Each certificate holder who wants to use this extension period must demonstrate and document how they will manage the associated the risk in relation with the time extension granted.</p> <p>The State of XXXXX will publish within its Ops Specs (in others) or in another official document, a temporary revision showing the exemptions granted.</p>	
--	--	--	---	--