



Government of India
DIRECTORATE GENERAL OF CIVIL AVIATION

AAC No. 5 of 2024
Revision 1
Dated July 2026

AIRWORTHINESS ADVISORY CIRCULAR

F. No. DGCA-25012(07)/9/2024-AW

Subject: Transition of existing CAR-145 organisations to the new requirements of CAR-145 Issue 3.

DGCA has revised requirements and issued CAR 145 Issue 3 dated 31st July 2024 which becomes effective on 1st January 2025. This AAC provides guidelines on the transition of existing CAR-145 Issue 2 Rev. 5 organisations to the new requirements of CAR-145 Issue 3.

Note: Existing approved maintenance organizations are supposed to be compliant with CAR 145, Issue 2 Rev 05 requirements.

I. Introduction

a. General

CAR-145 (Issue 3 dated 31.7.2024) along with newly introduced regulations CAR-CAO (Issue I dated 31.7.2024), CAR-CAMO (Issue I dated 31.7.2024), CAR-ML (Issue I dated 31.7.2024) and CAR-M (Issue 3 dated 31.7.2024) will become effective from 01-01-2025. Thereby, the structure of the existing regulation is modified as shown below:

Designation	Topic
CAR-145	Maintenance organisation (all types of aircraft types and operation)
CAR-M	Continuing airworthiness requirements – other-than-‘light aircraft’ and aircraft used by Air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937 Includes Subpart F and Subpart G organisation requirements, applicable only until 31st July-2026
CAR-ML	Continuing airworthiness requirements – ‘light aircraft’ not used by Air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937
CAR-CAMO	Continuing airworthiness management organisation (all types of aircraft types and operation)

CAR-CAO	Combined (continuing airworthiness management and/or maintenance) organisation – non-complex aircraft and operators other than Air operator certified in accordance with Rule 134 and Schedule XI of the Aircraft Rules, 1937
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Note: the denomination ‘Light aircraft’ means the following non-complex motor-powered aircraft:

- aeroplanes up to 2730 Kg MTOM
- rotorcraft up to 1200 Kg MTOM / max 4 occupants
- other LA2 aircraft.

b. Transition

From 1 January 2025 each maintenance organisation that holds a valid approval certificate issued in accordance with CAR 145 Issue 2 Rev. 5 should comply with the CAR 145 Issue 3 requirements. There is a transition period allowing the maintenance organisation to correct any findings of non-compliances with the new requirements in CAR 145 Issue 3 (‘transition findings’) until 31st July 2026.

The main change introduced in the regulation is the required implementation of a Safety Management System for maintenance organisations through CAR 145. SMS requires, amongst others, to implement hazard identification, risk management and safety assurance processes and the designation of a safety manager. To support the SMS processes, several organisation requirements have been changed including the safety policy, internal occurrence reporting, competence of staff, and compliance monitoring (replacing quality assurance). The safety risk and compliance monitoring management are considered part of the organisation’s overall management system.

Section II of this AAC illustrates a typical process that may be followed by a maintenance organisation for the transition from CAR 145 Issue 2 Rev. 5 to CAR 145 Issue 3.

Section III of this AAC, Guidance for Organisations, provides a step approach for the typical transition process.

Section IV of this AAC, provides actions by DGCA.

Appendix I details the changes in CAR-145 Section A, which applies to the technical requirements to be met by an organisation.

Convention:

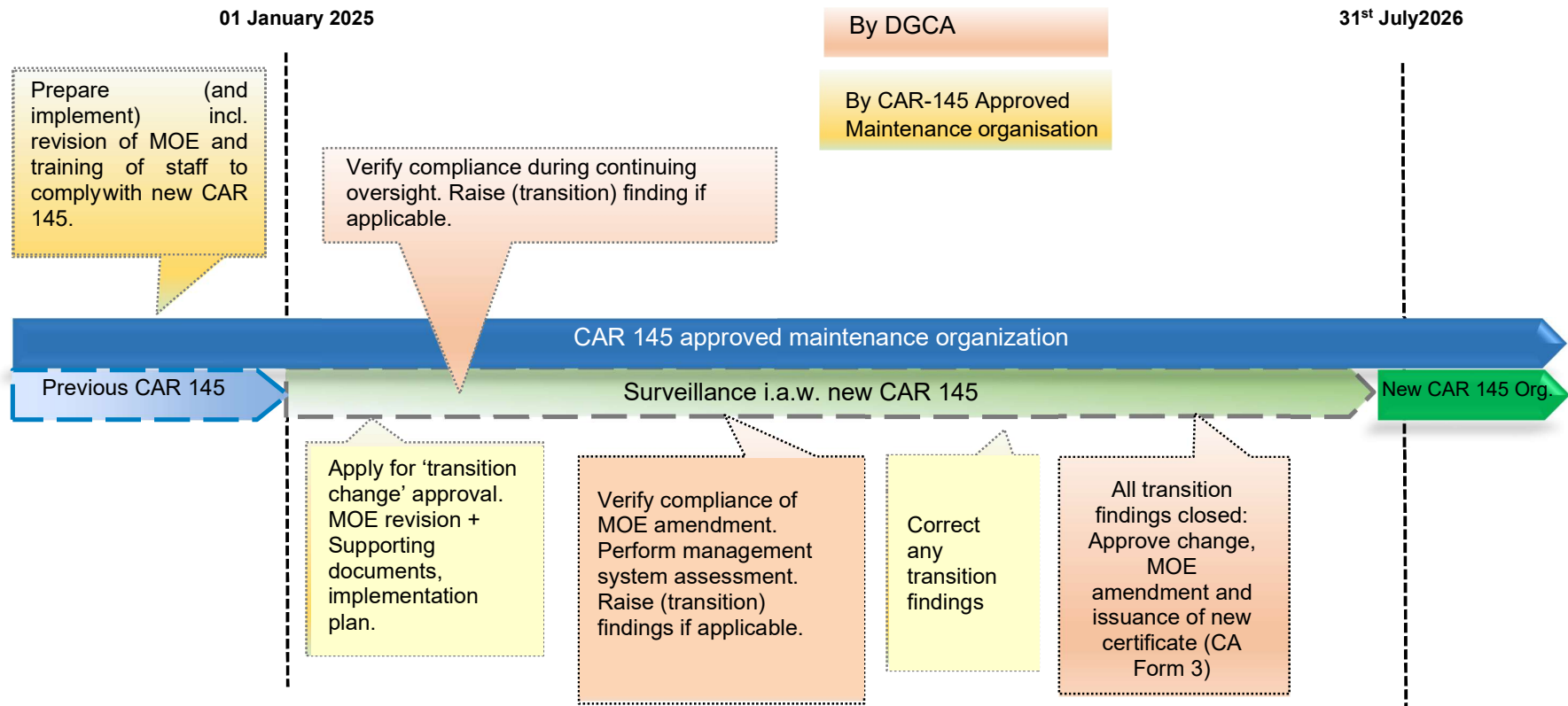
In the rest of this document:

- ‘new CAR-145’ is the CAR 145 Issue 3 issued on 31 July 2024
- ‘old CAR-145’ is the CAR 145 Issue 2 Rev. 05 dated 15 June 2021
- ‘Transition findings’ are findings of non-compliance related to the CAR 145 Issue 3 requirements as novel compared to ‘old CAR-145’. Refer to Appendix I. Closure date for these transition findings shall not exceed 31st July 2026. This may include a single ‘generic’ transition finding.
- ‘Generic transition finding’ that the maintenance organization has not introduced a management system pursuant the ‘new CAR-145’ requirements.

- 'Oversight finding' in this document is a finding raised against the requirements in old CAR-145, before the transition change is approved.

II. Overview of the transition to new CAR 145

The following figure provides an overview of the expected transition process and chronology:



Notes:

- Request for transition to new CAR 145 is required to be submitted online on EGCA platform from 01-01-2025.
- Transition finding could be generic or individual (refer to Section IV).
- Despite the flow is presenting an almost 18 months transition process, DGCA expectation is that the full process should typically last few months and be completed well before the deadline.

III. Guidance for organisations

a. Organisations not holding a CAR-145 Certificate (initial certification)

If your organisation is planning to be approved for the maintenance of aircraft and components or has applied for approval in accordance with 'old CAR 145' before 1 January 2025, you should consider to:

- Submit your application for initial certification and compliance documentation with 'old CAR-145' well in advance so that DGCA has sufficient time to perform the investigation, raising and evaluating the closure of all findings and issuing the corresponding certificate no later than 31 December 2024. After initial certification refer to III.b.

Note that if the application will have not been fully processed and certificate issued no later than 31 December 2024, your organisation will have to adapt and resubmit all documents in full compliance with 'new CAR-145' to be eligible for an initial approval.

b. Organisations holding a valid CAR-145 Certificate on 31 December 2024 – transition change

The maintenance organisation should develop a plan and implement the necessary changes. The maintenance organisation should apply to DGCA pursuant to para 145.A.85 for approval of:

- The revised MOE pursuant point 145.A.70 including, as a minimum,
 - the name of the person responsible for the safety management processes (145.A.70(a)(3);
 - the procedure that sets out the scope of changes not requiring prior approval (145.A.70(a)(10)), and
 - the procedure for amending the MOE (145.A.70(a)(11)).

All other changes may be included in the same application or, if within the scope of the MOE indirect approval procedure, notified as a change not requiring prior approval.

Organisation should consider to apply for the 'transition changes' (or notify, as applicable) on time to ensure that DGCA has sufficient time to perform the investigation, raising and evaluating the closure of all findings and approving the 'transition change(s)' not later than 31st July 2026.

Note: All existing organisations should submit application to DGCA for transition to ‘new CAR’ no later than 31.12.2025. In case existing old CAR 145 approved organization do not transition to new CAR 145, they may continue their activities with the existing approval only till 31st July2026.

c. Organisations holding a valid CAR-145 Certificate on 31 December 2024 – other changes during transition period

Maintenance organisation may apply for other changes (i.e., adding a rating or facility) during the transition period. In this case applicable fees as per Rule 133C of the Aircraft Rules, 1937 shall be charged.

d. Organisations holding a valid CAR 145 Certificate on 31 December 2024 – regular oversight during transition period

During the transition period, DGCA will perform continuing oversight. When findings of non-compliances with CAR 145 are found, the organization should adhere to the corrective action implementation period related to the type of finding. ‘Transition findings’ may have a longer implementation period but should ultimately be closed (including acceptance of DGCA) by 31st July2026. Regular oversight findings should be handled pursuant point 145.A.95.

e. Organisations holding a suspended CAR 145 Certificate on 31 December 2024

When the certificate is suspended the approval is considered not valid pursuant point 145.A.90(a)(3). As the maintenance organisation does not hold a valid approval at the date of applicability of new CAR 145, the transitional requirement does not apply. Therefore, if the maintenance organisation would like to have its approval reinstated by DGCA, the maintenance organisation must implement and demonstrate compliance with the new CAR-145 requirements prior to reinstatement.

IV. Actions by DGCA

1. Regular oversight after 31 December 2024

- The new CAR 145 requirements are applicable from 01 January 2025 and when non-compliances are found, DGCA should raise a finding; either a regular oversight finding or a transition finding.
- At the earliest opportunity after 31 December 2024, if no application for a transition change is received, upon evidence of non-compliance with the new CAR 145, DGCA may raise a “generic transition finding”. This could be particularly useful when the organisation is not properly planning or implementing the transition and the number of single transition findings will be too large.
- The proposed wording of the level 2 ‘generic transition finding’ is *‘the maintenance organisation has not demonstrated compliance with the CAR-145, Issue 3 requirements. The organisation shall take necessary measures to demonstrate to the satisfaction of DGCA that, before 31st July2026, it complies with the applicable requirements newly introduced by CAR*

145 Issue 3. To this end, the organisation should establish and communicate to DGCA an implementation plan. In the meantime the organisation shall continue working with the existing procedures as per the approved exposition’.

- By raising generic or individual transition findings at the earliest opportunity, DGCA would have better control over the progress within each organisation.
- If the oversight cycle is ending before the transition is completed, the recommendation report (new DGCA Form 6) should be used and include the open transition findings with latest closure date of 31st July2026. Other findings will be processed as per normal closure period.

2. Verification of compliance for each ‘transition change’ application.

- a. After receipt of the application, DGCA should assess the MOE amendment and supporting documents.
- b. If found acceptable, DGCA should perform an audit to assess the organisation’s management system and processes to make sure that all the required enablers of a functioning management system are present and suitable.
- c. When findings of non-compliance with the ‘new CAR 145’ are found, a transition finding should be raised which need to be closed latest by 31st July2026. DGCA may decide to initially grant a corrective action implementation period appropriate to the nature of the finding, i.e. earlier than 31st July2026.
- d. When satisfied that the organisation complies with the applicable requirements, DGCA shall formally approve the MOE and reissue approval certificate (DGCA Form 3) in accordance with ‘new CAR-145’. The new DGCA Form 6 should be used to document the assessment.

To monitor the status of maintenance organisations having completed or not (yet) completed the ‘transition change’, it is recommended that the regional offices maintains a list of organisations indicating the status.

Note: After the ‘transition change’ is approved, any non-compliance to new CAR-145 is an oversight finding, even if the transition period (31st July2026) is still running.

Sd/-
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Appendix I — Novelties in CAR-145

Potential transition findings are identified in yellow / Editorial changes not requiring dedicated transition finding (or to be covered by MOE, 145.A.70) are identified in blue		
CAR 145 requirement	Changes in 'new CAR 145'	Impact analysis
145.A.10 - Scope	No change in the requirement text	Potential adjustment only if there are changes in the AMCs/GMs
145.A.15 Application for an organisation certificate	Previous title 'Application' An application for the issue or variation of an approval shall be made to DGCA in a form and manner established by DGCA. The application shall be accompanied with para- wise CAR 145 Compliance Report.	Refer to the list of CAR M and CAR ML requirements that needs to be addressed in the MOE/procedures. Despite the new wording the organisation is expected to comply with this requirement before the transition. From 01 January 2025, organisations pursuing an initial certificate shall provide to DGCA the results of a pre-audit performed by the organisation against applicable requirements CAR M, CAR ML and 'new CAR 145'.
145.A.20 Terms of approval and scope of work	Previous title "Terms of approval" Scope of work in accordance with 145.A.70 Terms of approval attached to the organisation certificate issued by DGCA.	Check changes in 145.A.70 No transition finding foreseen
145.A.25 Facility requirements	No change	No impact
145.A.30 Personnel requirements	(a) Requirement for 'accountable manager' is reworded with potential impact on the description of responsibilities in the MOE. (b) Nominated person of group of persons representing the management structure (c) compliance monitoring instead of quality system (ca) new position ' Safety manager ' (cb) existing requirement (cc) existing requirement (d) re-wording with low impact on compliance (e) re-wording to account for 'safety management and compliance monitoring', addition of competency to include an understanding of safety management principles . (f) to (i) no change (j) extended to cover support staff for base maintenance (j)(1) and other re-wording with low impact on compliance	Potential transition finding. Accountable manager has a basic understanding of this CAR (CAR 145 Issue 3), in particular new responsibilities to establish and promote safety policy (reference to 145.a.200(a)(2)). Nominate safety manager and compliance monitoring manager (reusing as possible and desired the quality system function) (ca): Person responsible for the safety management processes ('safety manager') is subject to approval of DGCA in accordance with 145.A.85(a)(2). Nominated person or group of persons demonstrate a working knowledge of the changes new CAR 145 and changes in the new MOE/procedures (e): Organisation to establish and control the competency of the safety manager as well as to include in the competence for all personnel an understanding of the application of safety management principles.
145.A.35 Certifying staff and support staff	(a) to (c) no change (d) to (f) re-wording to emphasize up-to-date knowledge based on recurrent training and to include safety management (g) and (h) no change (i) reworded to account for nominated group of persons instead of single person Former (j) requirement to maintain a record of all certifying and support staff is covered by new 145.A.55(d). All subsequent requirements are changing letter and 145.A.35 (o) is removed	Training on safety management that can be accomplished through 145.A.30

	145.A.36 Records of airworthiness review staff is removed	Refer to 145.A.55(d)
Potential transition findings are identified in yellow / Editorial changes not requiring dedicated transition finding (or to be covered by MOE, 145.A.70) are identified in blue		
CAR 145 requirement	Changes in 'new CAR 145'	Impact analysis
145.A.40 Equipment and tools	No change	
145.A.42 Components	No change	
145.A.45 Maintenance data	(a) Editorial change including change of reference (old 145.A.55(c) equivalent to 145.A.55(a)(3)) (b) No change (c) Detected inaccurate, incomplete or ambiguous maintenance is also recorded as part of the internal safety reporting scheme (referred to in point 145.A.202) (d) editorial (e) added that also long maintenance tasks shall be transcribed onto the work cards or worksheets	Potential transition finding. This can be alternatively covered by a transition finding against 145.A.202 In case of non-compliance with paragraph 145.A.45(c) in respect to notification to the author an oversight finding should be raised
145.A.47 Production planning	(a) no change (b) planning shall take into account the human performance, including the threat of fatigue, as part of the management system (c) no change (d) new: The organisation shall ensure that aviation safety hazards associated with external working teams carrying out maintenance at the organisation's facilities are considered by the organisation's management system.'	Potential transition finding. This can be alternatively covered by a transition finding against management system. The organisation should amend current exposition and procedures to account for the changes in this requirement
145.A.48 Performance of maintenance	(a) containing former 145.A.80 (b) new: The organisation shall be responsible for the maintenance that is performed within the scope of its approval. (c) (1) to (4) are covering former 145 (a) to (d) (d) (5) new: referring to M(L).A.403(b) for assessment of aircraft defects	Despite the new points and numbers, there are not potential transition findings with the changes. In case of non-compliance with 145.A.48, an oversight finding should be raised. Editorial updates to the MOE and the procedures may be needed due to the changes.
145.A.50 Certification of Maintenance	(a) change to emphasize that the verification is performed by the certifying staff issuing the CRS (b) no change (c) 'aircraft operator' is replaced by 'person or organisation responsible for the aircraft continuing airworthiness' (d) change to clarify that CRS is issued by appropriately authorised certifying staff on behalf of the organisation. 'required maintenance' is replaced by 'maintenance that was ordered' (g) no change (f) editorial changes	Despite the new wording, no potential transition finding is expected in regards to compliance with the revised 145.A.50

Potential transition findings are identified in yellow / Editorial changes not requiring dedicated transition finding (or to be covered by MOE, 145.A.70) are identified in blue		
CAR 145 requirement	Changes in 'new CAR 145'	Impact analysis
145.A.55 Record-keeping	Previous title: 'Maintenance and airworthiness review records' (a) Maintenance records: (a)(1) previously (a), (a)(2) previously (b), (a)(3) previously (c), (a)(4) previously (c)(3) (b) Airworthiness review records: (b)(1) previously under (a), (b)(2) previously under (c), (b)(3) previously under (c)(3) (c) New: Management system, contracting and subcontracting records (d) Personnel records: (1)(i) new, (1)(ii) and (2) previously under 145.A.36, (3) previously 145.A.35(j), (4) only partially covered, (5) previously under 145.A.36 and 145.A.35(j) (e) New establishing the need of a record-keeping system (f) New establishing the need to document the format of the records (g) Previously under (c)(1) and (2)	Potential transition finding of non-compliance with 145.A.55(c) or (d)(1)(i). This can be alternatively covered by a transition finding against 145.A.200 and 145.A.205 Potential transition finding of non-compliance with 145.A.55(e) and/or (f) Editorial updates to the MOE and the procedures may be needed due to the changes in references
145.A.60 Occurrence reporting	(a) New: establishing occurrence reporting as part of the management system. Previously partially covered. (b) reworded but previously under 145.A.60(a). (c) New: reporting such events to the person or organisation that is responsible for the continuing airworthiness of that aircraft. (d) new: establishing the requirements for organisations that do not have their principal place of business in India, establishing both initial mandatory reports and, where relevant, a follow-up report	Potential transition finding of non-compliance with 145.A.60(a). This can be alternatively covered by a transition finding against 145.A.200 Potential transition finding of non-compliance with 145.A.60(c) or (d) as applicable In case of non-compliance with aspects covered previously by former 145.A.60 an oversight finding should be raised.
145.A.65 Maintenance procedures	Previous title: 'Safety and quality policy, maintenance procedures and quality system' (a) Safety and quality policy moved to 145.A.200(a)(2). reworded but previously under (b) (b) previously under (b)(1) and (b)(2) Former (c) related to quality system moved to requirement 145.A.200(a)(6)	Editorial updates to the MOE and the procedures may be needed due to the changes in references

Potential transition findings are identified in yellow / Editorial changes not requiring dedicated transition finding (or to be covered by MOE, 145.A.70) are identified in blue		
CAR 145 requirement	Changes in 'new CAR 145'	Impact analysis
145.A.70 Maintenance Organization exposition (MOE)	(a)(1) no change (a)(2) New: safety policy and the related safety objectives (a)(3) to (5) include person(s) nominated under points 145.A.30 (c) and new (ca) and their responsibilities, organisation chart (a)(6) 'scope of approval' replaced by 'scope of authorisation' (a)(7) now including the system that is in place to plan the availability of staff (a)(8) facilities covering all approved locations (a)(9) added link to point 145.A.20 (a)(10) procedure that sets out the scope of changes not requiring prior approval including notification (a)(11) editorial change (a)(12) generalised to the procedures specifying how the organisation ensures compliance with this Annex (a)(13) added 'regular' to aircraft maintenance services (a)(14) no change (a)(15) generalised to all approved locations (a)(16) no change (b) and (c): (b) is reviewed to specify that the initial MOE is subject to competent authority approval. MOE update and approval process managed as per points (a)(10) and (a)(11). Changes listed in point 145.A.85(a) shall be approved by the competent authority. New: Organisation shall develop a procedure to comply with (c), where previously the 'indirect approval procedure' was optionally ('may').	Potential transition finding of non-compliance with 145.A.70. The organisation should amend current exposition to account for all changes, requiring to address at least: - the statement signed by the accountable manager confirming work in accordance with the new CAR 145. - the safety policy (a)(2) - person(s) nominated under points 145.A.30 (c) and (ca) and their duties and responsibilities - new organisation chart - a general description of how the organisation ensures availability of staff (a)(7) - procedure defining the scope of changes not requiring prior approval and describing how such changes will be managed and notified (a)(10) and (11) - list of the approved locations and not only line stations in (a)(15) - list of the currently approved alternative means of compliance used by the organisation in (a)(17) MOE amendment for compliance with (a)(3), (a)(5), (10), (a)(11), and (c) has to be approved by DGCA. In case the organisation already has an approved procedure for 'indirect approval', this continues to be applicable unless the DGCA determined that the procedure is not meeting the requirements for the procedure changes not requiring prior approval. MOE amendment for other changes for compliance with new CAR 145 procedures may be in scope of changes not requiring prior approval. Potential transition finding of non-compliance with 145.A.70(c).
145.A.75 Privileges of the organisation	(a) and (b) editorial changes (c) to (e): no change	No impact
	145.A.80 deleted. The text is moved to 145.A.48 (a)	Editorial updates to the MOE and the procedures may be needed due to remove references to 145.A.80
145.A.85 Changes to the organisation	Content is mostly new with the following main changes: (a) establishing a list of changes that require prior approval by DGCA. (b) establishing the process for changes that require prior approval by DGCA (c) establishing the process for changes that do not require prior approval by DGCA	Potential transition finding of non-compliance with 145.A.85 As soon as the corresponding MOE procedures of 145.A.70(a)(10), (a)(11) and (c) are approved by DGCA, the organisation may apply the procedure for changes not requiring prior approval.

Potential transition findings are identified in yellow / Editorial changes not requiring dedicated transition finding (or to be covered by MOE, 145.A.70) are identified in blue		
CAR 145 requirement	Changes in 'new CAR 145'	Impact analysis
145.A.90 Continued validity	(a)(1) to (3) editorial changes and adding compliance with new CAR 145. References to 145.A.140 (b): added 'without delay'	In case of non-compliance, an oversight finding should be raised. Editorial updates to the MOE and the procedures may be needed to update relevant cross references.
145.A.95 Findings and observations	(a) Previously covered by 145.a.95(c). Added reference to point 145.A.95(a). (a)(1) new addressing the need to identify the root cause(s) of, and contributing factor(s) to, the non-compliance. (a)(2) and (a)(3) previously covered by 145.a.95(c). New It should be noted that the corrective action & implementation plan is subject to assessment and acceptance of DGCA pursuant to relevant APM. (b) new regarding the period agreed with that DGCA for the actions (c) new addressing the need to give due consideration to the observations in accordance with relevant APM	Potential transition finding of non-compliance with 145.A.95. (a)(2) would require the organisation to establish and implement procedures to submit the corrective action plan within the time frame granted and obtaining the acceptance of DGCA. In case of non-compliance with aspects covered previously by former 145.A.60 an oversight finding should be raised.
145.A.140 Access	Access to any facility covered by 145.A.90(a)(2), but now extended to any aircraft, document, records, data, procedures or to any other material and to DGCA.	Even if partially newly introduced, this requirement is not considered as a novelty and no potential transition finding is expected regarding this requirement. In case of non-compliance, an oversight finding should be raised. Editorial updates to the MOE and the procedures to update the relevant cross references.
145.A.155 Immediate reaction to a safety problem	145.A.155 add a new requirement to implement any safety measures mandated by DGCA.	Even if newly formally introduced through 145.A.155, this requirement is not considered as a novelty and apart from the case of the exposition update to account for that new article (refer to potential transition finding for MOE, refer to 145.A.70). In case of non-compliance, an oversight finding should be raised.

Potential transition findings are identified in yellow / Editorial changes not requiring dedicated transition finding (or to be covered by MOE, 145.A.70) are identified in blue		
CAR 145 requirement	Changes in 'new CAR 145'	Impact analysis
145.A.200 Management system	Requirement introducing novelties (a)(1) and (a)(2) was previously 145.A.65(a) (a)(6) was previously 145.A.65(c) (b) is new (c) is new but could already be in place	Potential transition finding. The organisation should amend current exposition quality system procedure to account for 145.A.200 and 145.A.202. Main novelties are: • 145.A.200(a)(2): Safety policy and related safety objectives. • 145.A.200(a)(3): identification of aviation safety hazards and management of associated risks. • 145.A.200(a)(4): safety promotion • 145.A.200(a)(5): documentation of all management system key processes. This is considered the main novelty of the regulation. As part of the transition of an organisation, DGCA should assess the organisation's management system and processes to make sure that all the required enablers of a functioning management system are present and suitable. In case of non-compliance with 145.A.200(a)(1)/(a)(4)/(a)(6) an oversight finding should be raised
145.A.202 Internal safety reporting scheme	Previously partly under 145.A.60(b). A new 145.A.202 Internal safety reporting scheme is added to establish an internal reporting scheme supporting the organisation's hazard identification and safety risk management processes and fostering its safety culture	Potential transition finding. The internal reporting scheme shall also be accessible to organisations (i.e. sub-contractors) working under the management system. It also forms the basis for establishing mandatory and voluntary occurrence reporting as required by CAR 145 Issue 3 and AAC 02 of 2024. The organisation should amend its procedures to account for 145.A.202
145.A.205 Contracting and subcontracting	A new 145.A.205 Contracting and subcontracting is added to clarify the responsibility of the CAR 145 organisation to ensure that any contracting or subcontracting complies with applicable requirements. Note that provisions for subcontracting were previously in AMC 145.A.75(b).	Potential transition finding. The organisation should amend current exposition to account for 145.A.205. In case of non-compliance with previous existing requirements (e.g. 145.A.75(b)), an oversight finding should be raised.