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LEGISLATIVE ACTS AND OTHER INSTRUMENTS

Subject:	Position to be taken on behalf of the European Union within the International Civil Aviation Organization as regards the notification of differences with respect to Annexes 1 and 6 to the Convention on International Civil Aviation due to the temporary measures related to the COVID-19 pandemic

POSITION TO BE TAKEN ON BEHALF OF THE EUROPEAN UNION
WITHIN THE INTERNATIONAL CIVIL AVIATION ORGANIZATION
AS REGARDS THE NOTIFICATION OF DIFFERENCES WITH RESPECT
TO ANNEXES 1 AND 6 TO THE CONVENTION ON INTERNATIONAL CIVIL AVIATION
DUE TO THE TEMPORARY MEASURES RELATED TO THE COVID-19 PANDEMIC

1. POSITION TO BE TAKEN

The position to be taken on the Union's behalf in reply to the State letter AN 11/55-20/50 issued by the International Civil Aviation Organization ("ICAO") on 3 April 2020 is to notify differences with respect to Annexes 1 and 6 to the Convention on International Civil Aviation (the "Chicago Convention") due to the temporary measures related to the COVID-19 pandemic as set out in the form attached to this position and further detailed by each notifying Member State in line with the individual exemptions it has granted under Article 71 of Regulation (EU) 2018/1139 of the European Parliament and of the Council[1].

[1] Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ EU L 212, 22.8.2018, p. 1).

2. DETAILED EXPLANATION

Differences to be notified are listed in the following table and further detailed by each notifying Member State in line with the individual exemptions it has granted under Article 71 of Regulation (EU) 2018/1139.

COVID-19 NOTIFICATION OF TEMPORARY DIFFERENCES FORM

With reference to the ICAO State Letter AN/11/55-20/50, the COVID-19 Contingency-Related Differences ("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 COVID-19 pandemic.

What?

It is recognised 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 Articles 38, 39 and 40 of the Convention on International Civil Aviation (the "Chicago Convention"), in order to conduct international operations where certificates and licenses differ to the minimum Standards in the Annexes to the Chicago Convention. It also allows the sharing of information on whether notified differences will be recognised or accepted by other States during this period.

When?

These temporary measures apply until 31 March 2021. That 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 authorised 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

Summarise 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 recognise 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 1 1.2.4.4.1	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. 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.	The validity periods of class 1 and 3 medical certificates issued by [the State] are extended by 4 months.	a) Rationale Holders of Class 1 and Class 3 medical certificates who are required to undergo a recurrent medical examination to revalidate their medical certificates to continue to exercise their licence or certificate privileges and are not able to reach or gain access to an aero-medical examiner or aero-medical centre timely, to complete the necessary medical examination. In addition, in many cases medical examiners have been reassigned to support the COVID-19 pandemic in their State. This would result in the expiry of said certificates. b) Conditions/mitigations [The State] requires that Class 1 and Class 3 medical certificate holders benefitting from this alleviation hold a valid medical certificate without limitations, except visual ones, prior to applying the alleviation.	As regards the certificates and licences issued by EU Member States, the differences are automatically recognised on the basis of Regulation (EU) 2018/1139. As regards recognition or acceptance of the validity of certificates and licences affected by the special temporary measures (related to COVID-19) issued by non-EU States, Commission Regulation No 452/2014 laying down technical requirements and administrative procedures related to air operations of third country operators applies[1].

[1] Commission Regulation (EU) No 452/2014 of 29 April 2014 laying down technical requirements and administrative procedures related to air operations of third country operators pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ EU L 133, 6.5.2014, p. 12).

Annex 1 1.2.5.1.2	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. 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. Note 1.— From 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.	The validity period of the licences issued by [the State] is extended by 4 months. If, towards the end of the extension, the reasons for granting the alleviation still apply, the validity period may be further extended for a period of up to 4 months. Since the relevant standard is met by the validity period of the ratings and endorsement (class, type and instrument ratings, unit endorsement) associated to the licence, the extension regards the validity period applies to: 1) class ratings, type ratings and instrument ratings endorsed in commercial pilot licences (CPL, MPL, ATPL) of pilots operating aeroplanes and helicopters with an operator; 2) class ratings, type ratings and instrument ratings endorsed in pilot licences (PPL, CPL, ATPL) of pilots involved in the operation of aeroplanes and helicopters outside an operator; 3) unit endorsements issued in air traffic controller licences.	a) Rationale Holders of commercial pilot licences who are required both to perform their licence proficiency check to revalidate the validity period of their type and instrument ratings and to comply with the applicable operator recurrent training and checking requirements, in order to continue to exercise their privileges, are not able to reach or gain access to flight simulators timely, to complete the necessary training and checking. This would result in the expiry of their ratings. Holders of pilot licences operating outside an operator, who are required to perform a proficiency check to revalidate the validity period of their class, type or instrument ratings, are not able to reach or gain access to aircraft or flight simulators timely, to complete the necessary flights, training and checking events. Holders of air traffic controller licences experience difficulties in access to synthetic training devices to complete their scheduled recurrent training / assessment activities.	

	Note 2.— 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. Note 2.— From 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. Note 3.— 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.		b) Conditions/mitigations [The State] requires: 1) Licence holders who hold a valid licence prior to applying the alleviation and who operate within an operator shall have received refresher training, followed by the completion of an assessment, by means established by the operator, to determine that the required level of knowledge to operate the applicable class or type are maintained. That assessment shall include class or type-specific abnormal and emergency procedures. Upon successful completion of the refresher training and the assessment, the new expiry date will be endorsed in the licence, or an official document with the new expiry date, issued by [the State], will be attached to the licence.		

	Note 3.— From 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 the State of the Operator, respectively, demonstrate their continuing competency in FSTDs approved by that State. Note 4.— See the Manual of Criteria for the Qualification of Flight Simulation Training Devices (Doc 9625). 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.		2) Licence holders of a valid licence prior to applying the alleviation and who operate outside an operator shall have received a briefing from an instructor who holds relevant instructional privileges in order to refresh the required level of theoretical knowledge to safely operate the applicable class or type and to safely carry out the relevant manoeuvres and procedures, as applicable. That briefing shall include class/type specific abnormal and emergency procedures, as appropriate. Upon successful completion of the briefing, the new expiry date will be endorsed in the licence, or an official document with the new expiry date, issued by [the State], will be attached to the licence. 3) In the case of ATCO unit endorsements in ATCO licences, the air navigation service provider (ANSP) ensures that the potential unavailability of synthetic training devices is mitigated by other means, e.g. computer-based training or the rescheduling of refresher training as soon as possible.	

Annex 6 Part 1 9.4.1.1	9.4 Qualifications 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. 9.4.1 Recent experience — pilot-in-command and co-pilot 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 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.	Subject to the evaluation of a risk assessment, the alleviation provided by [the State] allows individual operators to assign flight crew member tasks to pilots who are not meeting all recent experience requirements. The alleviations relate to either: a) reducing the number of required take-offs, approaches and landings; or b) extending the 90-day period; or c) both. The alleviations are subject to mitigating measures.	a) Rationale The COVID-19 crisis resulted in the cessation / significant reduction of commercial air transport operations and in difficulties in reaching the location where suitable flight simulators are available. This is leading to a large number of pilots who are not able to meet the recent experience requirements. b) Conditions/mitigations [The State] requires the following: Individual pilot's recency and qualifications, and their combination in the multi-crew operation environment, are considered to determine the alleviated crew composition. The operator has to develop a risk assessment to determine the probability and potential severity of the crew competency deterioration related to the extended absence from flying duties.	As regards the certificates and licences issued by EU Member States, the differences are automatically recognised on the basis of Regulation (EU) 2018/1139. As regards recognition or acceptance of the validity of certificates and licences affected by the special temporary measures (related to COVID-19) issued by non-EU States, Regulation No 452/2014 laying down technical requirements and administrative procedures related to air operations of third country operators applies.

		The criteria used for composition of the flight crew will distinguish between pilots who are "recent", "partially recent" or "not recent". "Partially recent" means a pilot that has carried out as pilot flying at least 2 take-offs, approaches and landings in the preceding 90 days, or 1 take-off, approach and landing in the last 30 days. In addition, the pilot's flight experience (total and in the type) and qualifications (e.g. instructor) are taken into account. The period of the alleviation is limited to the time needed for the operator to cope with the reduced flight schedule and the unavailability of flight simulators. No alleviations are granted if all required flight crew members have not carried out any flight / simulator activity in the preceding 90 days.	Appropriate mitigation measures to minimise the identified risks have to be determined and applied, with one or more operational restriction valid for the complete flight crew to reduce their exposure to demanding situations (e.g. reducing maximum crosswind limits, introducing higher approach minima, restricting runway surface conditions, dispatching with a functioning autoland system, if installed).	

Annex 6 Part 1 9.4.2.1	9.4.2 Recent experience — cruise relief pilot 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: a) operated as a pilot-in-command, co-pilot or cruise relief pilot on the same type of aeroplane; or 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.	The 9.4.1.1 alleviation is suitable to cover the alleviation from point 9.4.2.1, as it is addressing the overall flight crew composition.		

Annex 6 Part 1 9.4.4.1	9.4.4 Pilot proficiency checks 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. 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.	The validity period of operator's proficiency checks for each individual pilot is extended by [the State] for a period of 4 months. If, towards the end of the extension, [the State] considers that the reasons for granting the alleviation still apply, the validity period may be further extended for a period of up to 4 months.	a) Rationale The COVID-19 pandemic has resulted in drastic travel restrictions. The closure of borders between the majority of EU Member States have limited the operators' capability to perform pilot's competence checks twice a year in a flight simulator. The conduct of such checks in an aircraft is not always possible and in some cases may pose greater risks than the ones linked to the alleviation. b) Conditions/mitigations [The State] requires that pilots receive refresher training, followed by the completion of an assessment, by means established by the operator, to determine that the required level of knowledge to operate as flight crew member is maintained. That assessment shall include class or type – specific abnormal and emergency procedures.	As regards the certificates and licences issued by EU Member States, the differences are automatically recognised on the basis of Regulation (EU) 2018/1139. As regards recognition or acceptance of the validity of certificates and licences affected by the special temporary measures (related to COVID-19) issued by non-EU States, Regulation No 452/2014 laying down technical requirements and administrative procedures related to air operations of third country operators applies.

	Note 2.— See the Manual of Criteria for the Qualification of Flight Simulation Training Devices (Doc 9625).			
Annex 6 Part 2 3.9.4.2	3.9.4.2 Recent experience — pilot-in-command 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.	The 9.4.1.1 alleviation is suitable to cover the alleviation from point 3.9.4.2 as it is addressing the overall flight crew composition.		
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.	The 9.4.1.1 alleviation is suitable to cover the alleviation from point 3.9.4.3 as it is addressing the overall flight crew composition.		

Annex 6 Part 3 7.4.1.1	7.4 Qualifications 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. 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 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.	N/A		

Annex 6 Part 3 7.4.3.1	7.4.3 Pilot proficiency checks 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.	The validity period of operator's proficiency checks for each individual pilot is extended by [the State] for a period of 4 months. If, towards the end of the extension, [the State/State X,Y,Z] considers that the reasons for granting the alleviation still apply, the validity period may be further extended for a period of up to 4 months.	a) Rationale The COVID-19 pandemic has resulted in drastic travel restrictions. The closure of borders between the majority of EU Member States have limited the operators' capability to perform pilot's competence checks twice a year in a flight simulator. The conduct of such checks in an aircraft is not always possible and in some cases may pose greater risks than the ones linked to the alleviation. b) Conditions/mitigations [The State] requires that pilots receive refresher training, followed by the completion of an assessment, by means established by the operator, to determine that the required level of knowledge to operate as flight crew member is maintained. That assessment shall include class or type – specific abnormal and emergency procedures.	As regards the certificates and licences issued by EU Member States, the differences are automatically recognised on the basis of Regulation (EU) 2018/1139. As regards recognition or acceptance of the validity of certificates and licences affected by the special temporary measures (related to COVID-19) issued by non-EU States, Regulation No 452/2014 laying down technical requirements and administrative procedures related to air operations of third country operators applies.

	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. Note 2.— See the Manual of Criteria for the Qualification of Flight Simulation Training Devices (Doc 9625), Volume II — Helicopters.			

Annex 1 1.2.9	1.2.9 Language proficiency 1.2.9.1 Until 2 November 2022, aeroplane, airship, helicopter and powered-lift pilots, air traffic controllers and aeronautical station operators shall demonstrate the ability to speak and understand the language used for radiotelephony communications to the level specified in the language proficiency requirements in Appendix 1. 1.2.9.1 From 3 November 2022, aeroplane, airship, helicopter and powered-lift pilots; aeroplane, airship, glider, rotorcraft, powered-lift or free balloon remote pilots; air traffic controllers; and aeronautical station operators shall demonstrate the ability to speak and understand the language used for radiotelephony communications to the level specified in the language proficiency requirements in Appendix 1.	The language proficiency formal evaluation interval, prescribed by [the State], of aeroplane and helicopter licences holders, who demonstrate proficiency below the Expert Level (Level 6), whose language proficiency endorsement is expiring, is extended by 8 months. The language proficiency formal evaluation interval, prescribed by [the State], of Air Traffic Controllers, whose language proficiency endorsement is expiring, is extended by 4 months. If, towards the end of the extension, the reasons for granting the alleviation still apply, the validity period may be further extended for a period of up to 4 months.	a) Rationale The COVID-19 pandemic has resulted in drastic travel restrictions and closure of borders between the majority of States. As a consequence, pilots and Air Traffic Controllers, are not able to timely get access to an examination for maintaining their language proficiency. This would result in the expiry of their language proficiency endorsement. b) Conditions/mitigations [The State] requires the following: Pilots hold a valid language proficiency endorsement and receive a briefing from an instructor who holds relevant instructional privileges in order to refresh the required level of ability to speak and understand the language used for radiotelephony communication to safely operate.	As regards the certificates and licences issued by EU Member States, the differences are automatically recognised on the basis of Regulation (EU) 2018/1139. As regards recognition or acceptance of the validity of certificates and licences affected by the special temporary measures (related to COVID-19) issued by non-EU States, Regulation No 452/2014 laying down technical requirements and administrative procedures related to air operations of third country operators applies.

	1.2.9.2 Recommendation.— Flight engineers, and glider and free balloon pilots should have the ability to speak and understand the language used for radiotelephony communications. 1.2.9.3 Flight navigators required to use the radiotelephone aboard an aircraft shall demonstrate the ability to speak and understand the language used for radiotelephony communications. 1.2.9.4 Recommendation.— Flight navigators required to use the radiotelephone aboard an aircraft should demonstrate the ability to speak and understand the language used for radiotelephony communications to the level specified in the language proficiency requirements in Appendix 1.		Upon successful completion of the briefing the new expiry date will be endorsed in the licence, or an official document with the new expiry date, issued by [the State], will be attached to the licence. For Air Traffic Controllers holding a valid language proficiency endorsement, in the case of unavailability of a Language Assessment Body, air navigation service providers shall ensure that language proficiency is ensured through other means, e.g. on-line courses.	

	1.2.9.5 Until 2 November 2022, the language proficiency of aeroplane, airship, helicopter and powered-lift pilots, air traffic controllers and aeronautical station operators who demonstrate proficiency below the Expert Level (Level 6) shall be formally evaluated at intervals in accordance with an individual's demonstrated proficiency level. 1.2.9.5 From 3 November 2022, the language proficiency of aeroplane, airship, helicopter and powered-lift pilots; aeroplane, airship, glider, rotorcraft, powered-lift or free balloon remote pilots; air traffic controllers; and aeronautical station operators who demonstrate proficiency below the Expert Level (Level 6) shall be formally evaluated at intervals in accordance with an individual's demonstrated proficiency level.			

	1.2.9.6 Recommendation.— Until 2 November 2022, the language proficiency of aeroplane, airship, helicopter and powered-lift pilots, flight navigators required to use the radiotelephone aboard an aircraft, air traffic controllers and aeronautical station operators who demonstrate proficiency below the Expert Level (Level 6) should be formally evaluated at intervals in accordance with an individual's demonstrated proficiency level, as follows: a) those demonstrating language proficiency at the Operational Level (Level 4) should be evaluated at least once every three years; and b) those demonstrating language proficiency at the Extended Level (Level 5) should be evaluated at least once every six years.			

	Note 1.— Formal evaluation is not required for applicants who demonstrate expert language proficiency, e.g. native and very proficient non-native speakers with a dialect or accent intelligible to the international aeronautical community. Note 2.— The provisions of 1.2.9 refer to Annex 10, Volume II, Chapter 5, whereby the language used for radiotelephony communications may be the language normally used by the station on the ground or English. In practice, therefore, there will be situations whereby flight crew members will only need to speak the language normally used by the station on the ground.			

	1.2.9.6 Recommendation.— From 3 November 2022, the language proficiency of aeroplane, airship, helicopter and powered-lift pilots; aeroplane, airship, gliders, rotorcraft, powered-lift or free balloon remote pilots; flight navigators required to use the radiotelephone aboard an aircraft; air traffic controllers; and aeronautical station operators who demonstrate proficiency below the Expert Level (Level 6) should be formally evaluated at intervals in accordance with an individual's demonstrated proficiency level, as follows: a) those demonstrating language proficiency at the Operational Level (Level 4) should be evaluated at least once every three years; and b) those demonstrating language proficiency at the Extended Level (Level 5) should be evaluated at least once every six years.			

	Note 1.— Formal evaluation is not required for applicants who demonstrate expert language proficiency, e.g. native and very proficient non-native speakers with a dialect or accent intelligible to the international aeronautical community. Note 2.— The provisions of 1.2.9 refer to Annex 10, Volume II, Chapter 5, whereby the language used for Radiotelephony communications may be the language normally used by the station on the ground or English. In practice, therefore, there will be situations whereby flight crew members and remote flight crew members will only need to speak the language normally used by the station on the ground.			

Annex 1 4.2.2.	4.2.2.2 The privileges of the holder of an aircraft maintenance licence specified in 4.2.2.1 shall be exercised only: c) on condition that, within the preceding 24 months, the licence holder has either had experience in the inspection, servicing or maintenance of an aircraft or components in accordance with the privileges granted by the licence held for not less than six months, or has met the provision for the issue of a licence with the appropriate privileges, to the satisfaction of the Licensing Authority	The "preceding" period is extended by [the State] for a period of 6 months i.e. the preceding period totals to 30 months. The recent experience of six months is not modified.	a) Rationale The COVID-19 pandemic has resulted in drastic travel restrictions. Local restrictions may prevent approved organisations and qualified staff to demonstrate fulfilment of the requirements for continuation of their certificates or privileges within the time limits. b) Conditions/Mitigations [The State] requires that, when the certifying staff works for an approved maintenance organisation, this organisation can apply this extension to the recency requirements of its certifying staff when the approved organisation is not pending from suspensions, revocations or limitations, or has not been subject to suspension by the competent authority within the last 24 months.	As regards the certificates and licences issued by EU Member States, the differences are automatically recognised on the basis of Regulation (EU) 2018/1139. As regards recognition or acceptance of the validity of certificates and licences affected by the special temporary measures (related to COVID-19) issued by non-EU States, Regulation No 452/2014 laying down technical requirements and administrative procedures related to air operations of third country operators applies.

			In addition, point 66.B.500 of Annex III (Part-66) of Commission Regulation (EU) No 1321/2014[1] ensures additional mitigating measures whereby the competent authority shall suspend, limit or revoke the aircraft maintenance licence where it has been identified a safety issue or misconduct by the licence holder.	

[1] Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ EU L 362, 17.12.2014, p. 1).