

## Minutes of Meeting

A meeting under the Chairmanship of Director General, DGCA was held on 27.01.2025 to discuss the issues raised by BAOA. The meeting was attended by the senior officers of DGCA and representatives of BAOA led by Gp. Capt R.K. Bali, Managing Director BAOA.

At the outset the Chairman welcomed all the participants to the meeting. After a brief introduction about the BAOA and the participants the following issues as raised by BAOA were discussed.

### Discussion Points and Action Item

1. Modification of AAC 02/03 of 2023 – Direct Approval of Maintenance Outside Approved Locations (EASA Circular for OLM Activity, Para 2.3)

DGCA (DAW) informed that the current system in place is aligned with EASA. BAOA has urged for the incorporation of prior approval provisions into DGCA Circular, aligning with latest EASA regulations. DGCA advised BAOA to examine the latest EASA circular for provision under Para2.3 as being referred to by BAOA.

BAOA also raised the issue of not getting the approval for the usage of repetitive locations under AAC 03/2023, Para 6.2(d).

**Action: BAOA may see the latest EASA Circular dated 11/11/2022 for OLM Activity. As per said EASA circular, prior approval of Direct/other maintenance outside the approved location shall be required by operator before undertaking any such maintenance. As regards to the issue of approval for repetitive locations, the specific instances may be brought to the notice of DGCA (DAW), for suitable clarification by DGCA Hqrs.**

**Action By: BAOA / DGCA(DAW)**

2. Flight Duty and Flight Time Limitation – CAR Section 7 Series J Part IV

BAOA informed that the Maximum flight time with 3 crew ops is 12 Hrs and Flight duty period is 17 Hrs with the bunk seat available. With this Aircraft like G650 ER which has endurance of flight time of 14 Hrs is not achievable even with 3 crew. The Aircraft is designed with only 1 crew rest facility. It is proposed that the Operator may allowed to make their own FDTL Scheme so that the maximum endurance of the Aircraft may be utilized with the 3 Crew ops and the type of rest facility available in the Aircraft.

DGCA (FSD) informed that the operator are permitted to design their FDTL scheme within the framework of applicable CAR so as to effectively mitigate the crew fatigue safety risk. The regulation provides for the operator to have on-board crew rest facilities to utilize the maximum possible duty times. However, DGCA will review the

matter based on a paper to be submitted by BAOA including references of global best regulatory practices applicable for an equivalent type operations.

**Action: BAOA to submit a paper (as above) to DGCA for further review of feasibility of any relaxation in the regulation.**

**Action By: BAOA / DGCA(FSD)**

3. Experience Requirements for NSOP and GA Check Pilots/Examiners for Aircraft with AUW Less Than 5700 kg – CAR Section 7 Series I Part III - Current regulation requires multi-engine or jet engine flying hours, which may not be relevant for pilots operating single-engine aircraft less than 5700 kgs

Action: DGCA to review and amend experience requirements to ensure fair and practical guidelines for single-engine aircraft pilots.

**Action By: DGCA(FSD)**

4. Endorsement on Indian License for Aircraft Not Registered in India but Type Certified in India – CAR Section 7 Series G Part I - DGCA does not allow endorsements on Indian licenses for aircraft not registered in India. This creates a challenge when an operator is inducting a new type of aircraft in India for first time and thereby forces the operators to hire foreign pilots (FATA) for flying and training Indian crew. It was clarified by DGCA(DTL) that there is a provision under Section A, Schedule II of the Aircraft Rules, 1937 whereby only those type of aircraft which are registered in India and have a valid C of A can be endorsed on the pilot's license issued by DGCA.

**Action: DGCA to review the regulatory requirement for a suitable amendment in the Rules to enable endorsement of a new type aircraft on pilot license for the purpose of entry into service by an Indian operator subject to suitable condition like the aircraft having been type accepted by DGCA (pre-requisite for import of aircraft).**

**Action By: DGCA(DTL)**

5. CAR Section 3 Series C Part III- Single-Engine Aircraft on International Operations – BAOA suggested that single-engine aircraft are well-suited for international air ambulance operations to neighbouring countries, as was previously permitted. These aircraft are more cost-effective for life-saving missions.

**Action: DGCA to review the feasibility of such operations based on aircraft endurance and range limitations.**

**Action By: DGCA(DAT)**

6. Approval of Post Holder for NSOP – The requirements regarding the qualification for post holders for Operations and Training needs to be reviewed to allow a qualified

pilot having requisite experience to be accepted without insisting for the experience on the type of aircraft being operated. In case of a new type of aircraft being inducted for the first time in the country, on type experience is as such not practicable. DGCA (FSD) clarified that exemptions are being considered on a case to case basis.

**Action: DGCA to review the qualifications required for operations related post holder. BAOA may submit a detailed paper in this regard for further review by DGCA.**

**Action By: DGCA(FSD)**

7. Regulation for Foreign-Registered Aircraft – CAR Section 3 Series F Part III - Proposal to allow foreign-registered aircraft owned by Indian corporate houses and private owners to operate in India under an open-sky policy, similar to regulations in the US and Europe.

It was clarified that it may not be feasible for a foreign registered to be permitted to operate as freely as Indian registered aircraft and it may be advisable for such operators to register such aircraft in India, if they intend to operate such aircraft in India. However, the requirements will be reviewed in due course of time for any possible simplification.

8. Default EDTO Threshold of 90 for Aircraft Certified for EDTO 180 – CAR Section 3 Series S Part I - BAOA requested increasing the Extended Diversion Time Operations (EDTO) threshold from 90 to 120 minutes for aircraft certified for EDTO 180. Such enhancement would be subject to the aircraft's global airframe-engine flying hours and operational reliability as well as compliance with crew and engineering training requirements.

Action: It was clarified that there is a graded process for enhancing the EDTO operations and operator should utilise the process to obtain higher diversion time. However, BAOA to submit may submit a detailed justification incorporating global best practices to support this proposal, which shall be reviewed by DGCA.

**Action By: BAOA / DGCA(FSD/DAW)**

9. CAR Section 8 Series O Part IV - Night VFR/IFR Operations for Helicopters

BAOA requested to permit Night VFR/IFR for helicopter operations, especially to support HEMS (Helicopter Emergency Medical Services) viability.

Action: BAOA may submit a detailed proposal for further review by DGCA

**Action By: BAOA / DGCA(FSD)**

10. Pilot Training During Initial Aircraft Induction – CAP 3300

BAOA proposed to allow pilots' type training to be endorsed on Indian licenses during the induction phase when an aircraft type is already accepted/approved in

India. Since Phase 3 of the induction process mandates compliance with all post-holder and crew requirements, it was suggested that existing CAR 3-C-III and CAP induction processes be reviewed.

**Action: BAOA to submit a detailed proposal to bring out more clarity on the issues being faced and specific regulatory requirements to be reviewed in this regard.**

**Action By: BAOA**

**Conclusion:**

BAOA requested that such meetings of NSOP/GA operators may be held regularly to facilitate resolution of issues faced by the industry. DG agreed to the suggestion from BAOA and directed all concerned to take the action as per the MoM to be circulated for the meeting.

The meeting ended with a vote of thanks to the Chair.

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