



**REPUBLIC of SAN MARINO
CIVIL AVIATION AUTHORITY**

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SAFETY NOTICE No. 04/2020 Issue 02

GENERAL EXEMPTION (COVID-19 PANDEMIC)

1. The Civil Aviation and Maritime Navigation Authority ('the CAA'), on behalf of the Republic of San Marino as permitted by Article 7 of LAW No. 125 of 29 July 2014 as amended, exempts all operators ('the operator(s)') for whom 'the CAA' is the Competent Authority, the aircraft commander and all other relevant persons, from the requirements to complete recurrent training, flight crew recency and checking in accordance with the San Marino Regulations CAR OPS 1/2A/2H/3 as described in paragraph 2, subject to the conditions in paragraph 3.
2. This general exemption is applicable to the following:
 - a) operator proficiency checks (OPC);
 - b) line training and checking;
 - c) route and aerodrome competence;
 - d) operator emergency and safety equipment training and checking;
 - e) operator recurrent ground, refresher and flight training and checking;
 - f) operator cabin crew recurrent training and checking;
 - g) operator technical crew recurrent training and checking;
 - h) all other required training and checking (e.g. DG training, dispatcher training, loadmaster training, ground personnel training);
 - i) flight crew recency.
3. This general exemption is granted subject to the following conditions:
 - a) A valid licence and medical must be rendered valid according to the state of licence issue (this can include licences where the validity has been extended by State alleviation).
 - b) Provided that the regular validity period of training and checking, as set out in the applicable training and checking requirements of the applicable CAR OPS 1/2A/2H/3 expires before 31 October 2020, the validity period of all items listed in paragraph 2 may be extended by a further 4 months (this is in addition to the initial 4 month extension provided by Issue 01);
 - c) Except for single pilot operations, provided that the 90 days recency requirement of the applicable CAR OPS 1/2A/2H/3 expires before 31 October 2020, the validity period may be extended to 120 days. Operators should avoid crewing two pilots that are both out of recency, conduct a risk assessment to ensure mitigations are put in place and the most recent pilot should be pilot flying on the first sector. See COVID-19 Alleviations Table below.
 - d) The operator shall conduct a risk assessment and issue a flying staff instruction to establish an alternative training and checking programme. Any submission should clearly identify the areas of the requirements that are unable to be met and detail how continued competence will be demonstrated. The risk assessment should consider the following mitigations to maintain an equivalent level of safety:



- (i) the likely impact of a significantly reduced operation;
 - (ii) combination effect of multiple exemptions;
 - (iii) consideration given to implementing operating limitations;
 - (iv) total competency and proficiency should be considered;
 - (v) unusual operations should be limited to crew with regular validity on the licence;
 - (vi) total experience of crew concerned in terms of hours/route and or aerodrome familiarity;
 - (vii) increased risk due to limited number of operations by each crew member;
 - (viii) two pilots operating under exemption should not be scheduled together, or when both pilots are operating under the exemption, then one of them should be a line trainer, check captain, flight instructor or flight examiner;
 - (ix) use of distance learning to provide refresher training on knowledge and SOPs including normal and non-normal operations;
 - (x) pairing lower experienced crew member with more experienced crew member;
- e) The risk assessment shall clearly identify management of change back to normal operations post COVID-19 contingencies and how full compliance will be achieved once this exemption is revoked;
- f) The operator shall request permission to use this exemption from 'the CAA' by contacting their assigned project manager.
4. This approval is issued to meet the urgent operational needs of a limited duration to unforeseeable circumstances because of the COVID-19 PANDEMIC.
5. Individuals must carry a copy of this exemption when exercising the privileges granted under it.
6. Following the expiry/revocation of this exemption operators shall ensure that the aircraft commander and all other relevant persons are compliant with their approved OM Part D.
7. This approval has effect from the date it is signed until 28 February 2021, both dates inclusive, unless previously revoked.

Eng. Marco Conti
Director General





COVID-19 Alleviations Table – Flight Crew Recency

Line Pilot	Line trainer, instructor or examiner			Line Pilot		
	Fully Recent (3 TO/LGD in 90 days)	Partially Recent (1-2 TO/LDG in 90 days)	Not recent (no TO/LDG in 90 days)	Fully Recent (3 TO/LGD in 90 days)	Partially Recent (1-2 TO/LDG in 90 days)	Not recent (no TO/LDG in 90 days)
Fully Recent (3 TO/LGD in 90 days)	Compliant with Standard	OK	OK	Compliant with Standard	OK	NO
Partially Recent (1-2 TO/LDG in 90 days)	OK	OK	NO	OK	NO	NO
Not recent (no TO/LDG in 90 days)	OK	NO	NO	NO	NO	NO

1. Combinations labelled 'OK' are acceptable in line with the guidance provided.

2. Combinations labelled 'NO' are not acceptable and non-commercial flights should be used to regain recency.