

PEL CIRCULAR

CIRCULAR NO: 2025/C008

Application for Simplified Certification of Foreign Flight Crew ATOs

- Purpose** This circular provides guidance for foreign Approved Training Organisations (ATOs) seeking certification from the Civil Aviation Authority of Thailand (CAAT) under the Simplified Certification process, as described in TCAR PEL Part ORA, ORA.GEN.110. This process is designed to streamline certification for ATOs already approved by a recognized baseline Civil Aviation Authority (CAA).
- Related Regulation:** Requirements of the Civil Aviation Authority of Thailand No.77 on approval on the Approval of Training Organisation.
- Relevant Stakeholders:**
1. New Applicant: A legal entity seeking to obtain an initial Approved Training Organisation (ATO) certificate from the CAAT.
 2. Existing ATO: An organisation currently holding an ATO certificate that is undertaking steps to comply with the TCAR PEL Part ORA requirements.
- The following circular(s) shall be repealed:** PEL Circular 2025-C005 Application for Simplified Certification of Foreign Flight Crew ATOs dated on 22 June 2025
- Dated on:** 22 December 2025

DISCLAIMER

This document is intended solely to provide stakeholders with a clearer understanding of the applicable regulations. It serves as an explanatory guide and does not constitute or replace any regulation or legal requirement. For precise regulatory obligations, stakeholders should refer directly to the relevant regulations and official guidelines.

Step 1: Eligibility Requirements

To be eligible for Simplified Certification, your ATO must meet the following criteria:

- **Location:** The ATO must have its principal place of business located outside of the Kingdom of Thailand.
- **Existing Approval:** The ATO must hold a valid ATO certificate granted by a baseline CAA.
- **Acceptable CAA:** The baseline CAA that approved the ATO must be considered acceptable to CAAT. (See step 2 to determine if the CAA is acceptable.)
- **Equivalent Standards:** The standards under which the ATO was certified by the baseline CAA must be considered by CAAT to be similar to TCAR PEL Part ORA and Part FCL requirements.
- **Scope of Work:** The scope of work for which CAAT certification is sought must be part of the scope of work already approved by the foreign CAA.

Step 2: Collaboration with Baseline CAA

Prior to proceeding with the next stage of the approval process, it is essential to obtain formal collaboration from the Baseline Civil Aviation Authority (CAA). The notification to the Baseline CAA shall include the following elements:

- **Authentication of the Foreign ATO:** Full identification details, including name, physical location, and contact information.
- **Purpose of Collaboration:** A clear statement of intent, referencing ICAO Doc 9841, Appendix F, to ensure alignment with international standards.
- **Summary of Proposed Training Activities:** A concise description of the training programs intended to be conducted under CAAT approval.
- **Request for Cooperation:** Formal request for confirmation of the Baseline CAA's willingness to collaborate and provide support throughout the approval process.
- **Proposed Timeline and Contact Details:** An indicative schedule for the approval process and the contact information of CAAT personnel responsible for coordination.

Step 3: Determining CAA Acceptability

CAAT assesses the acceptability of baseline CAAs based on these factors:

- **ICAO USOAP Audit Results:** The CAA's performance in the ICAO Universal Safety Oversight Audit Programme (USOAP) must meet or exceed the global average in safety-related domains (Personnel Licensing, Operations and Airworthiness for in-flight training, and Personnel Licensing and Operations for FSTD Training). Refer to <https://www.icao.int/safety/CMAForum/Pages/USOAP-Results.aspx>
- **EU Air Safety List:** The CAA must not be banned from operating in EU airspace. Refer to https://transport.ec.europa.eu/transport-themes/eu-air-safety-list_en
- **IASA Category:** The CAA must be ranked as an IASA Category 1 country by the FAA. Refer to <https://www.faa.gov/about/initiatives/iasa/iasa-program-results>
- **Additional Considerations:** CAAT reserves the right to make the final determination regarding a CAA's acceptability based on a comprehensive assessment.

Step 4: Gap Analysis

A critical component of the Simplified Certification process is Gap Analysis. This analysis demonstrates the similarity between your ATO's standards and TCAR PEL requirements.

- **EASA ATOs:** For ATOs approved by an EASA member state, a previously completed gap analysis by CAAT may be utilized. Contact CAAT for confirmation.
- **All Other ATOs:** You must conduct a gap analysis comparing the regulations of your baseline CAA to TCAR PEL Parts ORA and FCL. The analysis should document all significant differences.

Step 5: Application Procedure

The application process consists of these phases:

- **Pre-Application Phase:** Contact CAAT to discuss your intention to apply and confirm the acceptability of your baseline CAA.
- **Application Phase:** Submit the following documents to CAAT:
 1. CAAT-PEL-TO-019 Application for ATO or FSTD Organisation Approval.
 2. Accountable Manager Commitment for the Simplified Certification Process for Foreign Approved Training Organization (see Annex 1).
 3. PEL-TO-CK-097 TCAR PEL Part ORA Statement of Compliance Checklist.
 4. A document containing any supplemental conditions and/or a rationale explaining how the training organization meets the TCAR PEL Parts requirements, addressing any differences identified in the gap analysis.
 5. Training Manual and Operations Manual (or equivalent).
 6. Manual regarding the Management System (or equivalent), including compliance monitoring and safety management systems (if applicable).
 7. Training programme, course syllabi for the programmes for which approval is sought.
 8. Results of the recognition of FSTD qualification certificates (if applicable).
 9. Key personnel acceptance letter from your baseline CAA (or equivalent).
 10. ATO Certificate and scope of approval from baseline CAA.
 11. Last audit report from your baseline CAA.
 12. Gap Analysis document.

Note: All documents must be submitted in English.

Step 5: Application Procedure

- **Document Evaluation Phase:** CAAT will analyze the submitted documents to verify compliance with TCAR PEL requirements. This will primarily be a desktop review.
- **Demonstration and Inspection Phase (if applicable):**
 1. If the gap analysis reveals significant differences, CAAT may conduct a targeted on-site inspection.
 2. In some cases, CAAT may conduct a videoconference focusing on areas needing clarification.

Note: In order for a type rating course to be considered for approval, the Operational Suitability Data (OSD), or other documentation deemed equivalent by the Civil Aviation Authority of Thailand (CAAT) for the designated aircraft, must be furnished to the CAAT for evaluation.

Step 6: Document Evaluation by the CAAT

CAAT will primarily focus on these key elements:

- Organisational Structure
- Training Programme(s)
- Courseware
- Instructors and Examiners
- FSTD Equipment and other training materials
- Record Keeping
- Compliance Monitoring Management (CMM)
- SMS (if applicable)

Step 7: Certification

Upon successful completion of the process, CAAT will issue an Approved Training Organisation (ATO) Certificate.

Step 8: Ongoing Obligations

As a CAAT-certified ATO, you are obligated to:

- Report any surveillance-relevant information to CAAT, including enforcement actions taken by your baseline CAA.
- Maintain all records according to established record-keeping procedures.

Key Considerations & Notes:

- **Annex 1 (Accountable Manager Commitment):** Ensure the commitment is tailored to your organization's context.
- **Gap Analysis:** The thoroughness of your gap analysis directly impacts the efficiency of the certification process.
- **Communication:** Maintain open communication with CAAT throughout the process.
- **English Language:** All documents and manuals must be in English.

Annex 1:

Accountable Manager Commitment to the Simplified Certification Process for Foreign Approved Training Organization.

The text below is an example of an acceptable commitment by the Accountable Manager.

This text shall be tailored to the context of the applicant.

1. Commitment to comply with Thai Regulations:

I, [Accountable Manager's Full Name], as Accountable Manager of [Organization Name], hereby ensure to the Civil Aviation Authority of Thailand (CAAT) that our organization is fully committed to comply with applicable Thai regulations, including but not limited to those specified in TCAR PEL Part ORA, FCL and to any amendment. We understand that compliance with Thai regulations is a condition to maintain the validity of our ATO approval certificate(s) issued by CAAT.

2. Reporting on surveillance conducted by the baseline CAA:

We understand that an ATO Approval certificate issued by the CAAT by simplified certification process only remains valid if the ATO Approval certificate issued by our baseline CAA remains valid.

Our organization will promptly share with the CAAT any surveillance report issued by our baseline CAA and in particular any instance of non-compliance identified by our baseline. We understand that timely reporting of any non-compliance is critical for maintaining the safety and integrity of our operations and is a requirement to maintain the validity of the CAAT ATO certificate.

3. Cooperation with CAAT for surveillance:

We fully understand that CAAT is entitled to conduct any onsite or online audits at any time to ensure continued compliance with Thai regulations. We are committed to cooperating with any audit that may be required by the CAAT and to granting access to our facilities and FSTDs to any auditor mandated by the CAAT. We understand that failure to cooperate with these audits or any delays in

providing requested information will be considered as a non-compliance that may compromise the validity of the certificate issued by the CAAT.

4. Changes to training specification and scope of approval:

Any change to the training specification and scope of approval attached to the ATO certificates issued by baseline CAA will be reported to the CAAT. This will allow the CAAT to amend the training specification attached to the ATO certificate issued by the CAAT.

We commit to informing you of any change of accountable manager and key personnel. In such case, this information will be provided together with the commitment signed by the new accountable manager.

To conclude, we acknowledge and accept that CAAT has the authority to limit, suspend or revoke our certificate(s) if we fail to meet our obligations and commitments.

Signed: _____

Dated: _____

Name of Accountable Manager: _____

On behalf of: [Organization Name]