

Summary Report

TCAR OPS Transition and Surveillance Plan Year 2026

Meeting with AOC (Air Operator Certificate) Holders

Cologne Meeting Room 8<sup>th</sup> floor

20 Jan 2026 Time: 13:00-16:30

**CAAT Participants:**

**Presence:**

- |                 |                             |
|-----------------|-----------------------------|
| 1. OPS Manager  | - Veera Cheevaidarakul      |
| 2. AIR Manager  | - Paisit Herabat            |
| 3. AIR Officer  | - Pannatat Chaleesombut     |
| 4. AIR Officer  | - Rachanon Kwanchu          |
| 5. HFO          | - Praphon Assawareeruk      |
| 6. HCT          | - Anan Tulyathan            |
| 7. HCS          | - Arthit Sumon              |
| 8. HDG          | - Supakit Riengsuwan        |
| 9. HOM          | - Waritha Kulkusol          |
| 10. HGA         | - Nitiya Ariya              |
| 11. Specialists | - Capt. Athisak Padchuenjai |
| 12. Specialist  | - Capt. Supamit Songpaisan  |
| 13. OPS Officer | - Jiroj Wuttiplakorn        |
| 14. OPS Officer | - Chayapha Kebraksa         |
| 15. OPS Officer | - Thunchanok Intravuth      |
| 16. OPS Officer | - Kanjana Piriyaaphanya     |
| 17. OPS Officer | - Papatsupa Sethasakunsiri  |
| 18. OPS Officer | - Pavinee Tongsrinak        |
| 19. OPS Officer | - Napatra Chuepan           |
| 20. OPS Officer | - Papawee Suksomdan         |

Air Operator Certificate (AOC) Holder Participants:


1. Bangkok Airways Public Company Limited
2. Thai Airasia Company Limited
3. Thai Airways International Public Company Limited
4. Thai Airasia X Company Limited
5. Nok Airlines Public Company Limited
6. Thai Lion Mentari Company Limited
7. MJets Limited
8. K-Mile Air Company Limited
9. Thai VietJet Air Joint Stock Company Limited
10. AC Aviation Company Limited
11. VIP Jets Limited
12. Siam Land Flying Company Limited
13. Advance Aviation Jet Company Limited
14. United Offshore Aviation Company Limited
15. SFS Aviation Company Limited
16. Thai Aviation Services Limited
17. Bangkok Helicopter Services Company Limited
18. Advance Aviation Company Limited
19. Asian Aerospace Services Limited
20. Pattaya Airways Company Limited
21. Siam Seaplane Company Limited
22. Thai Seaplane Company Limited

**Agenda:**

13:00 – 13:30	Registration
13:30 – 13:45	Opening remarks & CAAT Team Introduction
13:45 – 14:15	TCAR OPS Transition Progress & Next Steps
14:15 – 14:45	Surveillance Plan for Year 2026 & Risk-Based Methodology
14:45 – 15:15	Changes Related to an AOC Holder Concept
15:15 – 15:30	- Break -
15:30 – 16:00	CAAT Response to Questions
16:00 – 16:30	Q&A / Feedback

**Attachment:** *AOC Meeting\_TCAR Transition and Surveillance Plan Presentation*

Summary Report:

NO.	TCAR OPS Transition Progress & Next Steps
1	<p><b>1.1 Review on TCAR OPS Transition Plan</b></p> <p>CAAT opened the meeting with an update on the TCAR OPS Transition Plan, outlining the current progress within the three-year transition timeline. The regulations will become fully effective on 3 December 2026.</p> <p>As of the meeting date, the transition has reached Phase 4, during which Air Operators are conducting internal Management System Compliance Verification, with a deadline of 30 September 2026. Concurrently, CAAT will verify TCAR OPS compliance through surveillance activities, while IDE compliance will also be assessed.</p> <p>Both TCAR OPS and IDE verification must be completed by 3 December 2026, in accordance with the TCAR OPS Cover Regulations.</p> <p style="text-align: center;"><b>TCAR OPS Transition Plan</b></p>  <p style="font-size: small; color: red;">DISCLAIMER: THIS DOCUMENT HAS BEEN PROVIDED FOR MEETING PURPOSES AND CONTAIN NO LEGAL AUTHORITY. THE ORIGINAL SHALL REFER TO THE TCAR OPS COVER REGULATIONS AND TCAR OPS PARTS. THE CIVIL AVIATION AUTHORITY OF THAILAND SHALL ASSUME NO RESPONSIBILITY FOR ANY LIABILITIES ARISING FROM THE USE AND/OR REFERENCE OF THIS DOCUMENT.</p> <p>Air Operators acknowledged and understood the overall transition plan. No comments or questions were raised.</p>

CAAT subsequently outlined the key dates and milestones remaining in the TCAR OPS transition timeline.

## Moving Forward



Due Date	Requirement Description	Reference	Status
01 Jan 26	All <b>new specific approvals</b> must be granted using the requirements of <b>TCAR OPS Part SPA</b>	Article 21(1), 21(2), and 21(4)	Active
31 Mar 26	<b>Flight crew and FOO instructors*</b> qualified per <b>TCAR PEL</b> and standardized to <b>approved OM Part D</b>	Article 27(6)(b)	Upcoming
30 Jun 26	<b>FOO training/checking</b> commenced after this date must be <b>TCAR OPS Part ORO compliant</b> (operator conversion, differences, route training, DG, specific approvals)	Article 17(2)(a), 17(3), 17(4)	Upcoming
30 Sep 26	<b>Cabin crew initial training</b> commenced after this date must be <b>TCAR OPS Part CC compliant</b>	Article 16(5)	Upcoming
	<b>12-month compliance monitoring programme</b> completed using TCAR OPS requirements	Article 12(1)(b)	Upcoming
	<b>Demonstrate facilities, organization, and management system</b> compliance with <b>TCAR OPS Part ORO</b>	Article 27(4)	Upcoming

*\*The postponed timeline for FOO instructors will be announced by CAAT*

Due Date	Requirement Description	Reference	Status
3 Dec 26	<b>FULL TCAR OPS COMPLIANCE</b> - Receive TCAR OPS AOC and Operations Specifications	Article 8(2), 27(8)	Upcoming
	All aircraft compliant with <b>TCAR OPS Part CAT Subpart IDE</b>	Article 27(3)(d)	Upcoming
	All aircraft compliant with <b>TCAR OPS Part SPA</b> for specific approval operations	Article 27(3)(e)(ii)	Upcoming
	<b>Cabin crew members hold valid cabin crew <u>initial</u> training certificate</b> per TCAR OPS Part CC	Article 8a(1)	Upcoming
	<b>Cabin crew training commenced after this date must be TCAR OPS Part ORO compliant</b> (CRM, conversion, type specific, differences, DG)	Article 16(2)(a), 16(3)	Upcoming
	<b>Operations after this date must be under TCAR OPS Part SPA approvals</b>	Article 20(1)	Upcoming
31 Jan 27	<b>Flight crew training commenced after this date must be TCAR OPS Part ORO compliant</b> (CRM, type rating, differences, commander, UPRT, security, DG, specific approvals)	Article 15(2)(a), 15(3)	Upcoming
31 Dec 28	<b>Derogation Period - Compliance with</b> <ul style="list-style-type: none"> <li>▪ CAT.GEN.MPA.170 (Psychoactive Substances)</li> <li>▪ CAT.GEN.MPA.175(b)(c) (Endangering Safety)</li> <li>▪ CAT.GEN.MPA.215(a) (Support Programme)</li> </ul>	Article 27(10)	Upcoming

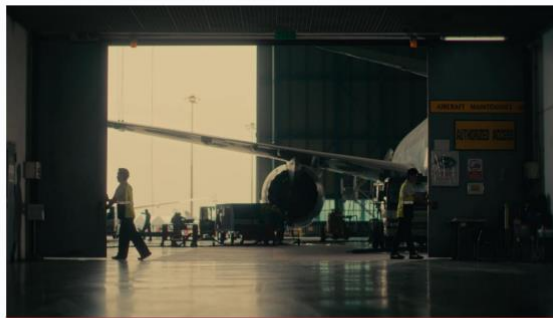

All Air Operators confirmed their understanding of the key dates presented under the 'Moving Forward' topic. There were no questions or comments.

1.2 Additional Required Action

CAAT informed the meeting that several open items within the TCAR OPS transition timeline require attention. These include the Minimum Equipment List (MEL) for TCAR OPS and the IDE Compliance List, as outlined in the presentation. Operators are requested to submit the relevant documents as detailed below:

### Additional Required Actions



	
<p style="text-align: center;"><b>MEL</b></p>	<p style="text-align: center;"><b>IDE Compliance List</b></p>
<p>All Air Operators please submit latest MEL (TCAR) to CAAT through EMPIC system, MELs will be approved under TCAR Regulations.</p> <p><b>Due Date: <u>ASAP</u></b></p>	<p>For Air Operators who <u>have not</u> submitted their IDE Compliance List by <u>individual aircrafts</u>, please submit through EMPIC system.</p> <p><b>Due Date: 14 February 2026</b> Expected verification timeline by 31 May 2026</p>

Remark: Submit MEL and IDE via EMPIC Job TCAR OPS Transition

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■ **Minimum Equipment List (MEL)**

- All Air Operators are required to submit the latest MEL in accordance with TCAR requirements to CAAT via the EMPIC system **ASAP**. All MEL submissions will be reviewed and approved under TCAR regulations.

■ IDE Compliance List

- Air Operators that have not yet submitted the IDE Compliance List for each individual aircraft are requested to submit the required documentation through the EMPIC system [by 14 February 2026](#).
- The expected verification will be completed by 31 May 2026 (Tentative by CAAT).

All Air Operators acknowledged the required actions concerning the open items. No questions or comments were raised.

CAAT subsequently presented the key dates pertaining to personnel groups, namely Flight Crew, Cabin Crew, and Instructors & Evaluators.

1.3 Flight Crew and Cabin Crew Transition

## Flight Crew and Cabin Crew Transition



### Flight Crew (FC)



<b>Validity</b>	Training delivered under old regulations remains valid (Art. 15(1)) Training delivered after entry into force is valid if <b>completed by 31 Jan 2027</b> (Art. 15(2))
<b>New Training</b>	Flight crew training <b>commenced after 31 Jan 2027</b> must be TCAR OPS Part ORO compliant (Article 15(2)(a), 15(3))

### Cabin Crew (CC)



<b>Certificate</b>	Must obtain TCAR OPS Initial Training Certificate <b>by 03 Dec 2026</b> (Art. 8a(1))
<b>Initial Training</b>	Initial training <b>commenced after 30 Sep 2026</b> must be TCAR OPS compliant (Art. 16(5))
<b>Validity</b>	Training <b>completed by 03 Dec 2026</b> under old regulations is given full credit for TCAR OPS (Art. 16(4))
<b>New Training</b>	Training <b>commenced after 03 Dec 2026</b> must be TCAR OPS Part ORO compliant (Article 16(2)(a), 16(3))
<b>Senior Cabin Crew (SCC)</b>	SCC designated <b>before 03 Dec 2026</b> are considered as meeting prerequisite requirements. (Art.8a(2))

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## Instructors and Evaluators

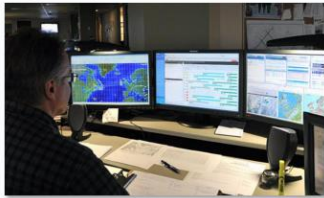


### Instructors & Evaluators



<b>Flight Crew instructors</b>	Must be qualified (TCAR PEL) and standardized (OM Part D) not later than 31 Mar 2026 (Art.27(6)(b))
<b>Cabin Crew (CC)</b>	Evaluators/ Instructors: Must meet TCAR OPS Part CC and ORO requirements after 30 Sep 2025 (Art.8a(3))

### Flight Operations Officers (FOO) Instructor



*The postponed timeline for FOO instructor will be announced by CAAT*

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All Air Operators acknowledged the key dates concerning personnel groups. No questions or comments were raised.

#### 1.4 Specific Approvals (SPA)

CAAT provided a reminder to Air Operators concerning Specific Approvals: those subject to re-evaluation during the TCAR OPS transition, and those that will transfer automatically, where applicable.

	<div style="text-align: right; margin-bottom: 10px;">  </div> <h2 style="text-align: center;">Specific Approvals (SPA)</h2> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center; vertical-align: top;">  <p><b>Automatic Transfer</b> <i>(No new demonstration required)</i></p> <p>Approvals granted under previous regulations are considered compliant (Art.20 (2)(3))</p> <ul style="list-style-type: none"> <li>✓ PBN (RNP AR APCH, RNP 0.3)</li> <li>✓ RVSM</li> <li>✓ DG</li> <li>✓ SET-IMC</li> <li>✓ HEMS</li> </ul> </td> <td style="width: 50%; text-align: center; vertical-align: top;">  <p><b>Action Required</b> <i>(Re-evaluation)</i></p> <p><b>LVO (Low Visibility):</b> Must obtain TCAR OPS Approval. Old data may be used but case-by-case agreement required (Art.24)</p> <p><b>ETOPS/EDTO:</b> Must obtain TCAR OPS Approval. Demonstration flights may be reduced if procedures are identical (Art.25)</p> <p><b>EFB (Type B):</b> Previous test data may be used, but compliance to Part SPA must be shown (Art.26)</p> </td> </tr> </table> <p style="text-align: center; margin-top: 10px;">All Air Operators acknowledged the criteria for specific approvals. No questions or comments were raised.</p>	 <p><b>Automatic Transfer</b> <i>(No new demonstration required)</i></p> <p>Approvals granted under previous regulations are considered compliant (Art.20 (2)(3))</p> <ul style="list-style-type: none"> <li>✓ PBN (RNP AR APCH, RNP 0.3)</li> <li>✓ RVSM</li> <li>✓ DG</li> <li>✓ SET-IMC</li> <li>✓ HEMS</li> </ul>	 <p><b>Action Required</b> <i>(Re-evaluation)</i></p> <p><b>LVO (Low Visibility):</b> Must obtain TCAR OPS Approval. Old data may be used but case-by-case agreement required (Art.24)</p> <p><b>ETOPS/EDTO:</b> Must obtain TCAR OPS Approval. Demonstration flights may be reduced if procedures are identical (Art.25)</p> <p><b>EFB (Type B):</b> Previous test data may be used, but compliance to Part SPA must be shown (Art.26)</p>
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<p><b>Surveillance Plan 2026 &amp; Risk-Based Methodology</b></p>			
<p>2.</p>	<p><b><u>2.1 What are the changes to the Surveillance Plan for Year 2026?</u></b></p> <p>CAAT delivered a presentation on the 2026 surveillance plan, highlighting its distinctive nature due to surveillance activities occurring concurrently with the TCAR OPS verification process. The risk-based methodology for OPS surveillance planning has also been revised and implemented for 2026. This session was intended to provide Air Operators with an understanding of how the 2026 surveillance plans were established, as well as the expected implementation approach in subsequent years.</p> <p>In accordance with the TCAR OPS transition timeline, all Air Operators will undergo full-scope surveillance audits at the Main Base level. En-route and station audits, however, will continue to be planned based on the previous year's risk-based results. Following completion of the transition, risk-based scores will be reset for subsequent years.</p>		

# What are the changes in Surveillance Plan?

BEFORE

NOW



Surveillance History of Year 2024												
Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
CAAT Oversight Programs												

Surveillance Plan of Year 2025												
Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
CAAT Oversight Programs												

**Audit / Inspection Code:**  
 FOI : Flight Operations Inspector  
 OMI : Operations Management Inspector  
 CSI : Cabin Safety Inspector  
 DGI : Dangerous Goods Inspector  
 AWI : Airworthiness Inspector

**Main Base Audit is a combination of all functions:**  
**MBA-A consists of;**  
Update

**MBA-B consists of;**  
Update

**MBA-C consists of;**  
Cancel

**En-Route Inspection**  
 ENF : In-Flight Cockpit Inspection  
 ENC : In-Flight Cabin Inspection  
 R : Ramp Inspection

**Station Audit is conducted with;**  
 LG : Station, Ground Facilities and Systems  
 DG-LSA : Dangerous Goods Line Station Audit  
 AIR-LSA : Airworthiness Line Station Audit

**SAFETY consists of but is not limited to;**  
Cancel

**TTP** : Inspection of Training Programme with Simulator  
**SPEC** : Special Audit

**Audit / Inspection Code:**  
 FOI : Flight Operations Inspector  
 OMI : Operations Management Inspector  
 CSI : Cabin Safety Inspector  
 DGI : Dangerous Goods Inspector  
 AWI : Airworthiness Inspector

**Main Base Audit is a combination of all functions:**  
**MBA-A consists of;**  
 O : Organizational Structural Management  
 TR-FC : Training and Qualification Records Inspection for Flight Crew  
 TR-FOD : Training and Qualification Records Inspection for Flight Dispatcher  
 SMS : Safety Management System  
 CMS : Compliance Monitoring System  
 FDM : Flight Data Monitoring  
 ERP : Emergency Response Plan  
 CMBA : Cabin Safety Main Base Audit  
 DMBA : Dangerous Goods Main Base Audit  
 ABA : Airworthiness and Aircraft Engineering Base Audit

**MBA-B consists of;**  
 OFR : Operation and Flight (Trip) Records  
 OC : Operational Control  
 R : Ramp Inspection  
 MG : Ground Station Facilities and Systems  
 FSDS : Flight Safety Document System  
 FTL : Flight and Duty Time Records Inspection

**En-Route Inspection**  
 ENF : In-Flight Cockpit Inspection  
 ENC : In-Flight Cabin Inspection  
 R : Ramp Inspection

**Station Audit is conducted with;**  
 LG : Station, Ground Facilities and Systems  
 DG-LSA : Dangerous Goods Line Station Audit  
 AIR-LSA : Airworthiness Line Station Audit

**TTP** : Inspection of Training Programme with Simulator

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# What are the changes in Surveillance Plan?

BEFORE



Surveillance Plan of Year 2024												
Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
CAAT Change Programs												
CAAT Change Programs												
CAAT Change Programs												
CAAT Change Programs												

**Audit / Inspection Code:**  
 FOI : Flight Operations Inspector  
 OMI : Operations Management Inspector  
 CSI : Cabin Safety Inspector  
 DGI : Dangerous Goods Inspector  
 AWI : Airworthiness Inspector

**Main Base Audit is a combination of:**  
**MBA-A consists of;**  
 O : Organizational Structural Management  
 TR-FC : Training and Qualification Records Inspection for Flight Crew  
 TR-FOO : Training and Qualification Records Inspection for Flight Dispatcher  
 SMS : Safety Management System  
 CMS : Compliance Monitoring System  
 FDM : Flight Data Monitoring  
 ERP : Emergency Response Plan  
**MBA-B consists of;**  
 CMBA : Cabin Safety Main Base Audit  
 DMBA : Dangerous Goods Main Base Audit  
 ABA : Airworthiness and Aircraft Engineering Base Audit

**MBA-C consists of;**  
 OFR : Operation and Flight (Trip) Records  
 OC : Operational Control  
**En-Route Inspection**  
 ENF : In-flight Cockpit  
 ENC : In-flight Cabin  
 R : Ramp Inspection  
**Station Audit is conducted by:**  
 LG : Station, Ground Facilities and Systems  
 DG-LSA : Dangerous Goods  
 AIR-LSA : Airworthiness

**SPECIAL AUDIT**  
 ITP : Inspection of Training Programme with Simulator  
 SPEC : Special Audit

**Line Station Audit**  
 ITP : Inspection of Training Programme with Simulator

**SAFETY consists of but not limited to:**  
 SPEC will no longer appear in surveillance plan as part of risk-based results but still valid, inspector may consider adding if needed, based on risks

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- **MBA-A consists of:**
  - O : Organizational Structural Management
  - TR-FC : Training and Qualification Records Inspection for Flight Crew
  - TR-FOO : Training and Qualification Records Inspection for Flight Dispatcher
  - SMS : Safety Management System
  - CMS : Compliance Monitoring System
  - FDM : Flight Data Monitoring

## TCAR OPS Transition and Surveillance Plan Year 2026

- ERP: Emergency Response Plan
- CMBA : Cabin Safety Main Base Audit
- DMBA : Dangerous Goods Main Base Audit
- ABA : Airworthiness and Aircraft Engineering Base Audit

■ **MBA-B consists of:**

- OFR : Operation and Flight (Trip) Records
- OC : Operational Control
- R : Ramp Inspection
- MG : Ground Station Facilities and Systems
- FSDS : Flight Safety Document System
- FTL : Flight and Duty Time Records Inspection

■ **EN-Route Inspection consists of:**

- ENF : In-flight Cockpit Inspection
- ENC : In-flight Cabin Inspection
- R : Ramp Inspection

■ **Station Audit is conducted with;**

- LG : Station, Ground Facilities and Systems
- DG-LSA: Dangerous Goods Line Station Audit
- AIR-LSA : Airworthiness Line Station Audit

■ **ITP : Inspection of Training Programme with Simulator**

All Air Operators acknowledged the Surveillance Plan for Year 2026, and the changes to the Risk-Based Methodology. No questions or comments were raised.

2.2 TCAR Transition and Surveillance Planning for Y2026

## TCAR Transition and Surveillance Planning for Y2026



**Surveillance History of Year 2025**

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
CAAT Oversight Programme												

**Surveillance Plan of Year 2026**

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
CAAT Oversight Programme												

**Remarks:**

- Audit program shall be scheduled on the basis of risk assessment to address specific areas of concern.
- Special audit activities will be scheduled on specific or special flight operations.
- Audit plan and schedule are subject to change with or without notice. All changes require the approval of the Flight Operations Standards Manager.
- Special Audit and Resource Inspections are subject to approval of the Flight Operations Standards Manager and CAAT Director General.

**Checklist**



All Surveillance will be conducted by using TCAR Checklists

For AOCs who have not implemented TCAR

- Findings against AOCR = Findings
- Findings against TCAR OPS = Observation

**Timeline**



TCAR Verification through Surveillance

- MBA-A: Q3 Onward
- MBA-B: Q1 Onward
- For some AOCs: FTL, CMS, and SMS have been separated from the MBA

**RBS**



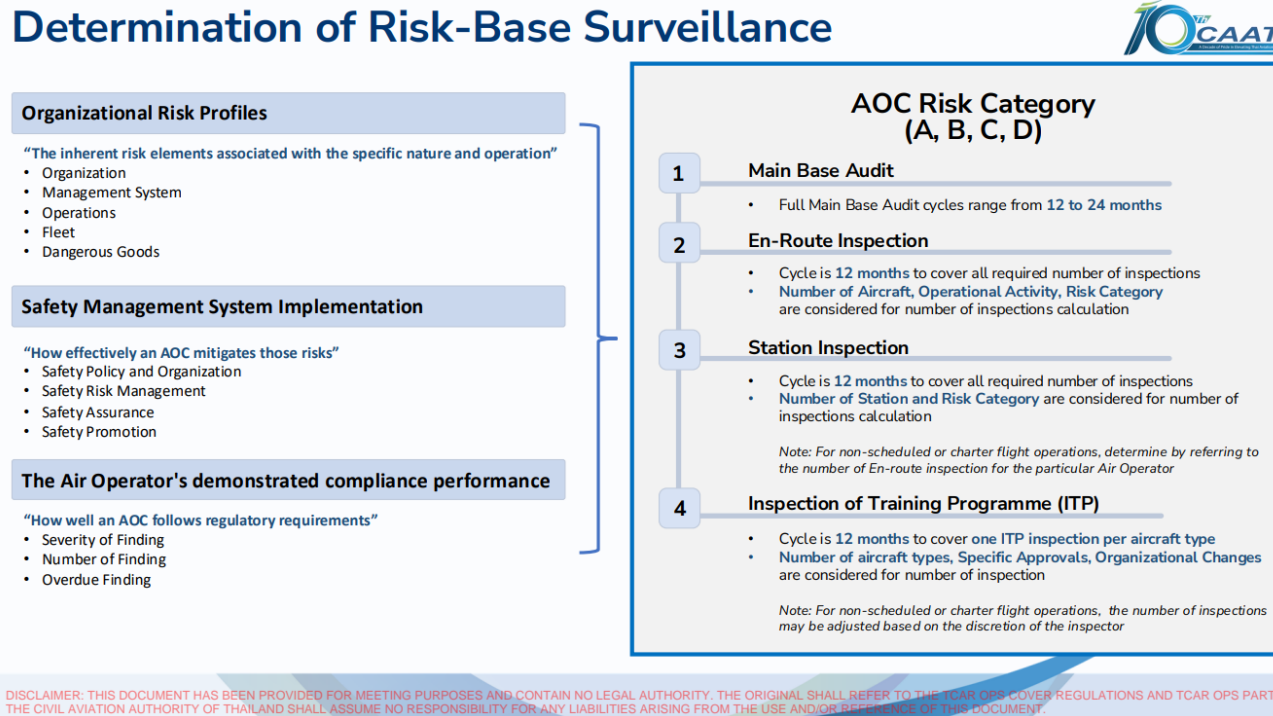
TCAR Transition will Enable a Full RBS Reset for Y2027

- Full MBA is required for all AOCs in Y2026
- Number of En-route and Station inspection is calculated according to Y2025 RBS
- Y2026 data collection will serve as the baseline for a complete reset of RBS for Y2027

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CAAT explained the basis on how the surveillance will be audited – the checklists used, the allocation of MBA-A and MBA-B activities, and the reset of each Air Operator’s risk-based results.

2.3 Determination of Risk-Base Surveillance



CAAT determines the AOC Risk Category (A, B, C, D) based on three key factors:

- **Organisational Risk Profiles** — inherent risk elements such as Organisation, Management System, Operations, Fleet, and Dangerous Goods
- **Safety Management System Implementation** — how effectively the AOC mitigates risks through Safety Policy and Organization, Safety Risk Management, Safety Assurance, and Safety Promotion
- **Demonstrated Compliance Performance** — how well the AOC follows regulatory requirements, measured by severity, number, and overdue status of findings

	<p>The resulting risk category determines the surveillance cycle for each activity:</p> <ul style="list-style-type: none"> <li>▪ <b>Main Base Audit</b> — 12 to 24-month cycle based on risk category</li> <li>▪ <b>En-Route Inspection</b> — 12-month cycle; number of inspections determined by aircraft count, operational activity, and risk category</li> <li>▪ <b>Station Inspection</b> — 12-month cycle; based on number of stations and risk category</li> <li>▪ <b>Inspection of Training Programme (ITP)</b> — 12-month cycle covering one inspection per aircraft type; considers aircraft types, Specific Approvals, and organisational changes</li> </ul> <p><u>Note:</u> For non-scheduled or charter operations, en-route inspections are determined by reference to the operator's activity level, and ITP inspections may be adjusted at the inspector's discretion.</p> <p>All Air Operators acknowledged the additional details on Surveillance Plan for Year 2026, and the changes to the Risk-Based Methodology. No questions or comments were raised.</p>
<p><b>Changes Related to an AOC Holder</b></p>	
<p>3.</p>	<p><b>Changes Related to an AOC Holder</b></p> <p>In preparation for the full implementation of TCAR OPS regulations on 3 December 2026, CAAT provided a comprehensive explanation of the concept of Changes Related to an AOC Holder, in accordance with TCAR OPS Part ORO.GEN.130. This regulation establishes that any changes affecting an Air Operator Certificate's scope, operations specifications, or management system components must be carefully managed and receive appropriate approval from CAAT prior to implementation. The presentation covered the regulatory framework, the types of changes requiring notification or approval, and the expected process for managing such changes under the new regulations.</p> <p>CAAT's intention in presenting this topic was to share the details with the industry at an early stage and invite feedback or concerns from Air Operators. Such input is considered valuable in refining the process and ensuring a smooth transition as both the regulator and operators prepare to operate under the new TCAR OPS regulatory framework.</p> <p>CAAT is seeking to amend the process to ensure it remains lean and efficient, with a view to reducing repetitive actions and enabling both the regulator and Air Operators to work more effectively.</p>



## Current Challenges

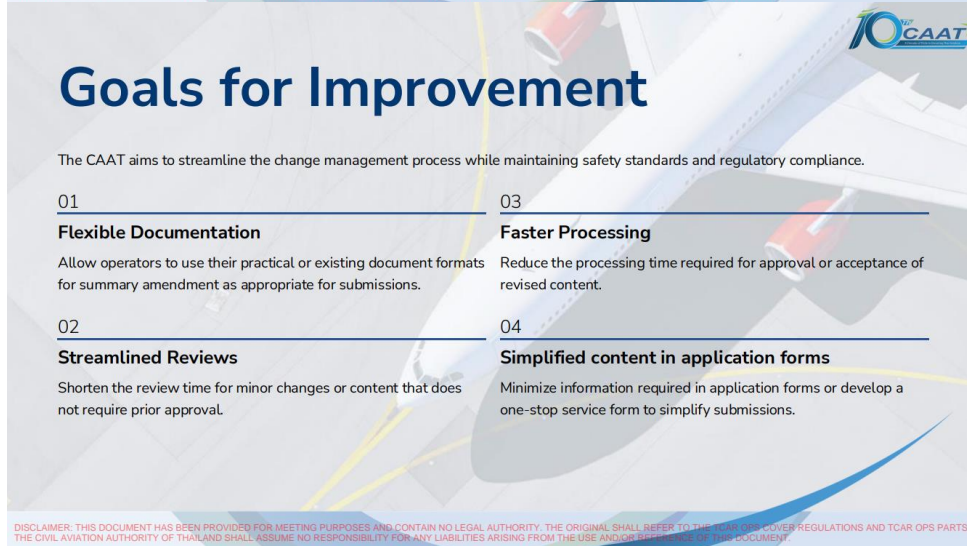
**01 Duplication of Work**  
Operators face redundant, repetitive work completing Form 204, creating inefficiencies and delays in the submission process.

**02 Inspector Burden**  
Inspectors spend a considerable amount of time on manual due to the absence of clear criteria for distinguishing between contents requiring approval/acceptance. This situation reduces inspectors' capacity to focus on critical oversight and surveillance activities.

**03 Excessive Wait Times**  
Operators experience significant delays during each manual revision cycle, impacting operational efficiency.

**04 Complex Applications**  
The AOC Variation form contains excessive information spanning 24 pages, creating unnecessary complexity.

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## Goals for Improvement

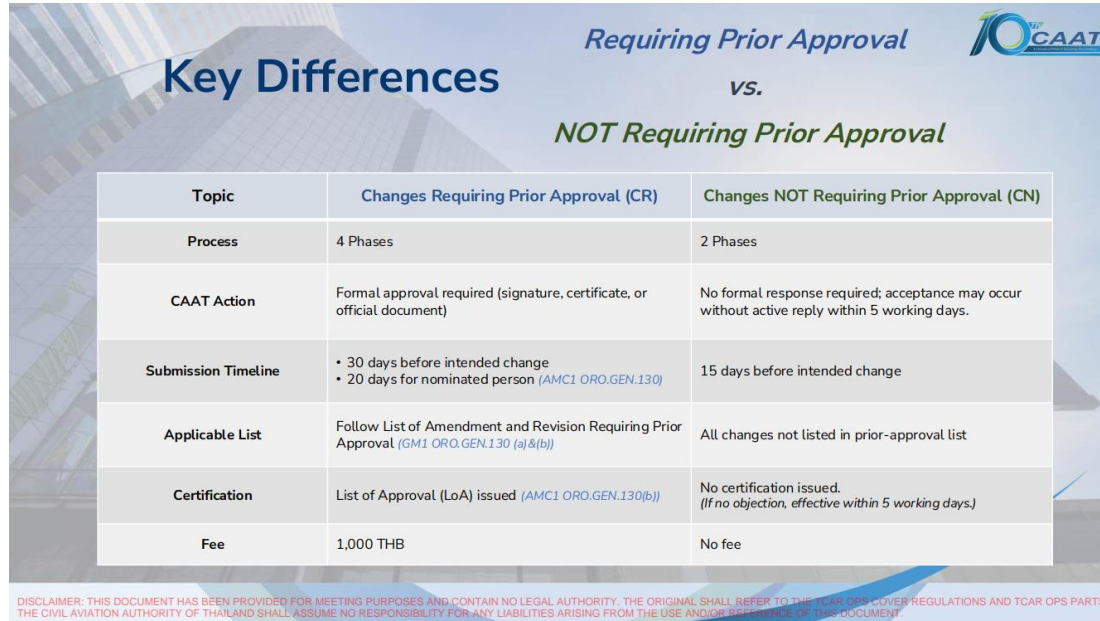
The CAAT aims to streamline the change management process while maintaining safety standards and regulatory compliance.

<p><b>01 Flexible Documentation</b> Allow operators to use their practical or existing document formats for summary amendment as appropriate for submissions.</p>	<p><b>03 Faster Processing</b> Reduce the processing time required for approval or acceptance of revised content.</p>
<p><b>02 Streamlined Reviews</b> Shorten the review time for minor changes or content that does not require prior approval.</p>	<p><b>04 Simplified content in application forms</b> Minimize information required in application forms or develop a one-stop service form to simplify submissions.</p>

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Overview of Change Management Process

There are **two types of changes**: **Changes Requiring Prior Approval (CR)** and **Changes NOT Requiring Prior Approval (CN)**. Operators identify the need for a change (new, temporary/urgent revision, or new issue) and classify it accordingly. All changes are submitted to CAAT via the **EMPIC system** for compliance review. After approval or acknowledgment, operators implement the change and upload finalized documents to the **FOSD system**.



**Key Differences**  
Requiring Prior Approval vs. NOT Requiring Prior Approval

Topic	Changes Requiring Prior Approval (CR)	Changes NOT Requiring Prior Approval (CN)
Process	4 Phases	2 Phases
CAAT Action	Formal approval required (signature, certificate, or official document)	No formal response required; acceptance may occur without active reply within 5 working days.
Submission Timeline	<ul style="list-style-type: none"> <li>30 days before intended change</li> <li>20 days for nominated person (AMC1 ORO.GEN.130)</li> </ul>	15 days before intended change
Applicable List	Follow List of Amendment and Revision Requiring Prior Approval (GM1 ORO.GEN.130 (a) & (b))	All changes not listed in prior-approval list
Certification	List of Approval (LoA) issued (AMC1 ORO.GEN.130(b))	No certification issued. (If no objection, effective within 5 working days.)
Fee	1,000 THB	No fee

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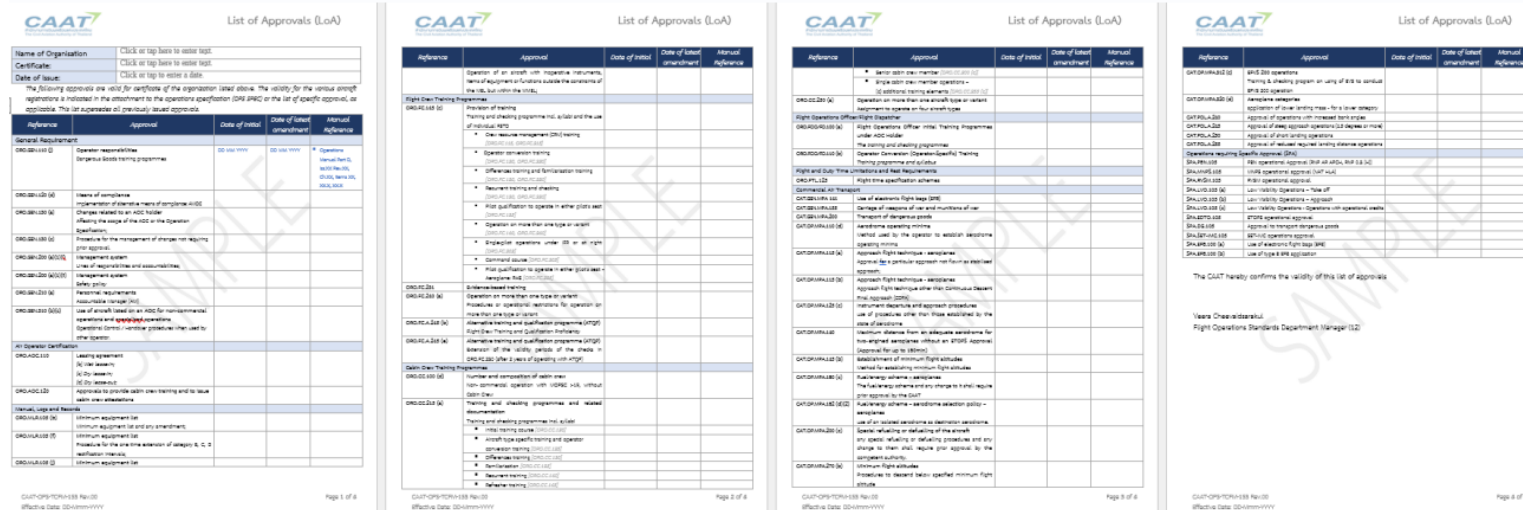
Proposed Revision/Amendment (PRA) Form

The **PRA Form** is a single-entry point for operators to submit both **Changes Requiring Prior Approval (CR)** and **Changes NOT Requiring Prior Approval (CN)** through the **EMPIC system**. The key benefits are describes as below:

- Consolidate information into a single proposal document.
- Acts as a proposal form with verification check items to ensure that all changes are identified prior to approval.
- Requires additional information to be provided in a simplified, clear, and concise manner, representing the minimum information required for the application.
- Form 203 will be replaced by this form.

**List of Approval (LoA)**

- The **List of Approval (LoA)** is issued by CAAT during **Phase 4** of the Changes Requiring Prior Approval (CR) process. After the operator completes the certification payment and submits the **Final Compliance List**, CAAT grants formal approval by issuing the LoA.
- The LoA specifies each approved item, including the **reference, scope of approval, date of initial and latest approval**, and the **relevant manual references**. It serves as official evidence of CAAT approval and supersedes previous approvals for the listed items.



The image displays four screenshots of the CAAT List of Approvals (LoA) system interface. Each screenshot shows a table with columns for Reference, Approval, Date of Initial, Date of Latest Amendment, and Manual Reference. The first screenshot shows a summary table with various approval codes and descriptions. The second and third screenshots show detailed views of specific approvals, including their scope and manual references. The fourth screenshot shows a confirmation message from the CAAT team.

**Important Note:** CAAT emphasized that the concept for ‘Changes Related to an AOC Holder’ is still in the *developmental stage* and may be subject to amendment prior to final implementation.

All Air Operators acknowledged and no questions or comments were raised during this agenda.

CAAT Response to Questions from AOC	
4.	<p>The Flight Operations Standards Department (OPS) Manager addressed questions previously submitted by Air Operators during the December 2025 registration period. The questions, which were submitted together with the online registration form, were addressed individually through the presentation.</p> <p>1) Could you please clarify the criteria applied in determining both the appropriate surveillance intervals and the number of surveillance activities to be conducted?</p> <p>2) Questions related to Surveillance Plan 2026 and Risk-Base  <i>Answer to 1) &amp; 2): Refer to the Surveillance Plan and Risk-Based Methodology in item 2.</i>  <i>- Additional Discussion: A question was raised by an Air Operator, whether the results of the risk-based evaluation will be published, or will it be possible to be requested by the AOC? OPS manager informed that the risk-based results will not be published, adding that the operator can get a general idea of their evaluation score through the 12/24 months cycle count.</i></p> <p>3) Will the surveillance plan include the timeframe for the new AOC issuance?  <i>Answer: The Surveillance Plan does not include the timeframe for issuing a new AOC; the timeframe will depend on the completion of all scope of surveillance activities and the closure of all findings.</i></p> <p>4) In 2025, the operator was audited using TCAR-OPS checklists in most of the scope, will our new AOC be issued sooner or will all AOC holders be issued AOCs at the same time?  <i>Answer: The new AOC will be issued after surveillance has been completed in all scopes in accordance with the Year 2026 Surveillance Plan, including the closure of all findings within the specified timeframe.</i>  <i>As most scopes have already been verified through surveillance using TCAR checklists, the time required in 2026 may be reduced as the main objective in 2026 is to follow-up on previous findings and verify implementation.</i>  <i>- Additional Discussion: OPS Manager informed that the finding status must be closed before issuing the TCAR OPS Air Operator Certificate.</i></p> <p>5) สำหรับสายการบินที่อยู่ระหว่าง TCAR Transitions การตรวจสอบประจำปี สามารถตรวจใน AREA พร้อมกันทั้ง TCAR และ AOCS ได้หรือไม่  <i>Answer: Under the TCAR OPS Transition Plan:</i> <ul style="list-style-type: none"> <li>• For scopes where the manuals have already been approved and accepted, surveillance for 2026 will be conducted in accordance with TCAR OPS regulations.</li> </ul> </p>

- For scopes where the manuals have not yet been approved/accepted under TCAR OPS, the Air Operator must proceed with developing and/or revise all operations manuals and compliance monitoring program in accordance with TCAR Cover Regulations.

An AOC under TCAR OPS can only be issued once all scopes have been fully verified in accordance with TCAR OPS Regulations

- **Additional Discussion:** The OPS Manager advised that findings will be issued under TCAR OPS regulations if an air operator has implemented the requirements.

- 6) ทางบริษัทฯ มีแผนที่จะ implement TCAR operation procedure ในช่วงต้นปี โดยคาดว่าจะใช้เวลา 1-3 เดือน ซึ่งมีโอกาสที่จะซ้อนทับกับ surveillance interval ซึ่งเข้าใจว่าจะตรวจ scope TCAR ทาง CAAT มีแนวทางอย่างไรเพื่อจะไม่ให้เกิด Non-conformity ที่เกิดขึ้นจากการตรวจสอบ surveillance ในระหว่างที่บริษัท กำลัง implement procedure ตามแผน Transition ที่ได้นำเสนอไว้

Answer: During surveillance, if there is any non-compliance with TCAR OPS Regulations or the approved manuals is identified, the inspector will initially assess the issue against the operator's implementation plan.

- If the relevant scope is implemented as specified in the implementation plan, the non-compliance will be issued as a finding against TCAR OPS.

- 7) Surveillance Programme 2026 – Integration with Audit Cycle. Could CAAT provide guidance on how the updated TCAR surveillance oversight model will be integrated into the operator's internal audit programme? Specifically, should the operator adjust its risk-based audit cycle to mirror the new CAAT monitoring framework?

Answer: The surveillance plan will be conducted in accordance with CAAT's established plan.

- **Internal Audit Cycle**

- The Compliance Monitoring Program should be designed appropriate to the complexity of the operator, with audit frequency and scope reflecting its operational scale and risk profile.

- **Risk-Based Approach Considerations**

- CAAT's risk-based criteria are national-level indicators used to calculate oversight across multiple airlines with different characteristics. As such, certain criteria may not be directly applicable to a single airline's specific operations. Operators adopting a risk-based approach should establish criteria that are appropriate and specific to their own operations in order to achieve suitable risk levels and meaningful outcomes

- 8) What is the TCAR OPS Transition plan before current AOC expires in October 2026?

Answer: In cases where an AOC expires in October 2026, the operator should submit the renewal application documents in accordance with the renewal process. The AOC shall eventually be issued under TCAR OPS regulations as required in the Cover Regulations. The operator should complete the

## TCAR OPS Transition and Surveillance Plan Year 2026

*renewal process, including the transition to TCAR OPS, before the AOC expires. If the operator is unable to complete TCAR OPS transition before the AOC expires, they may renew under regulation before the entry into force of TCAR OPS.*

9) การทำ AOC Variation ในระหว่างการรอออกใบ AOC certificate แบบ TCAR ซึ่งจะมีผลอย่างไร หากทำการเพิ่มคุณสมบัติต่างๆ ทั้ง add fleet หรือ add scope.

Answer: *Before the TCAR OPS AOC is issued:*

- *Variations may be processed in accordance with the current established procedures;*
- *The applicable regulation for variations is TCAR OPS.*

10) Internal Audit Requirement Before Transition, does the operator still need to perform an internal audit against TCAR OPS before fully transitioning from AOCA to TCAR OPS and before inviting CAAT for Surveillance Program 2026?

Answer: *Cover Regulation to TCAR OPS Iss.02 Rev.00, Article 12, Item (1)(b), specifies that the Compliance Monitoring Program must be completed no later than 30 September 2026 to demonstrate full compliance with TCAR OPS. Therefore, operators must conduct an internal audit to fully transition to TCAR OPS.*

*- Additional Discussion: OPS manager advises that the Internal Audit and Surveillance Plan shall be performed separately, referring to cover regulation.*

11) Clarification on Effective Dates Related to Training Program Updates, for TCAR OPS-driven changes affecting training programs (Flight Crew, Dispatch, SMS, QA), are operators required to implement training immediately upon approval of the revised manuals, or is a grace period allowed prior to full implementation?

Answer:

- *No requirement for immediate implementation after approval of revised training manuals*
- *If implementation cannot commence immediately, the effective date or implementation start date may be specified in the relevant manual sections in advance, and in accordance with the operator's transition timeline.*
- *Training may then be implemented accordingly, with personnel training completion required within the timeframe specified in*
  - *Applicable TCAR OPS Cover Regulation (Article 14–19)*
  - *Operator's transition plan for each type of training*

12) Operations Manuals Effective Date & Issue/Revision Numbers, the operator stated in the TCAR OPS Transition Plan that our Operations Manuals (OM-A, OM-B, OM-C, OM-D, and FDM) will become effective on 1 January 2026. Could you please advise how we should reset the issue and

revision numbers for OM-A, given that Chapter 7 (FTL) and Chapter 9 (DG) have already been effective since 2025?

*Answer: The control of Operations Manuals' effective dates & issue/revision numbers should be implemented according to the operator's planned transition timeline, and under the operator's document control procedures*

13) MEL Approval Status, the MELs appear to be the last manuals that cannot easily become effective, even though we have submitted the IDE to OPS and CAAT OPS has raised no objections to approving our MELs.

*Answer:*

- *For MEL, operators are requested to submit the latest version of MEL (TCAR version) via EMPIC for CAAT approval ASAP.*
- *For IDE, Operators who have not submitted IDE (listed by 1 form/individual aircrafts) are requested to submit via EMPIC within 14 February 2026 for CAAT approval. During the transition period, MEL is requested to submit to AIR as usual.*

14) การปฏิบัติงานด้าน Airworthiness ควบคู่กับ การ Implementation TCAR OPS ควรออกมาในลักษณะอย่างไร

*Answer:*

- *Before 3 December 2026, the operators shall implement according to:*
  - *AOCR Chapter 9 (excludes item 2.7, 20, 21, 29, and 33) and related Appendices (Appendix I, P, W, Y, AA, AB, AC, AE, and AF)*
  - *AOCR Chapter 12 (for aeroplane) and HOR Chapter 6 (for helicopter)*
  - *AOCR Chapter 13 (for aeroplane) and HOR Chapter 9 (for helicopter)*
- *From 3 December 2026 onwards, the next applicable Airworthiness regulation will be transposed from AOCR (during transitional period to TCAR AIR regulation). However, during the TCAR AIR Transition period, the AOCR chapters 9, 12, and 13 will remain in effect temporarily.*

15) Request TCAR OPS Audit Checklist, Request TCAR PEL and AIR checklist

*Answer: Currently, the Audit/Inspection checklists for OPS & AIR can be accessed and downloaded from the CAAT website ([https://www.caat.or.th/certificate\\_license/192446/](https://www.caat.or.th/certificate_license/192446/)) Note: The link to PEL checklists will be added soon to the same page.*

16) What is the plan regarding synchronization with TCAR-PEL which is not fully enforced at this time?

*Answer: CAAT recognizes that TCAR-PEL implementation is still in a transitional phase, and therefore: Interim alignment measures will be applied between TCAR-OPS and TCAR-PEL to ensure continuity of operations. Existing approved licensing, training, checking, and recency arrangements will continue to be accepted where they are:*

## TCAR OPS Transition and Surveillance Plan Year 2026

	<ul style="list-style-type: none"> <li>• Equivalent to ICAO standards</li> <li>• Not in conflict with TCAR-OPS safety objectives</li> <li>• Full synchronization will be achieved through:             <ul style="list-style-type: none"> <li>- Phased enforcement of TCAR-PEL</li> <li>- Transitional provisions and exemptions where appropriate</li> <li>- Continued coordination between OPS and PEL functions</li> <li>- CAAT will approve the LPC &amp; OPC Scenario, the operators is required to submit scenario starting from JAN 2027 onwards</li> </ul> </li> </ul> <p>17) Transition plan, HOFO (Helicopter Offshore Operations) and Part SPO subpart MCF (Maintenance check flight)</p> <p><u>Answer:</u> The TCAR HOFO inspection will be conducted in July 2026. For TCAR Part SPO MCF has not yet been announced, so the existing procedure can still follow current regulation. TCAR OPS Part SPO is expected to be published within February 2026. Flight Crew qualification for TCAR Part SPO MCF has been granted credit according to Cover Regulation Art.14(a).</p> <p>18) TCAR OPS Part SPO Implementation schedule 2026</p> <p><u>Answer:</u> The expected publication of TCAR OPS Part SPO within February 2026 which will have a transition period of 3 years.</p>
<p><b>Questions and Answers (Q&amp;A), and Sharing during the Session</b></p>	
5	<p>1) A question was raised by Air Operator when will the LoA be implemented?</p> <p><i>CAAT is expected to take effect from September onwards. The LoA will be controlled by CAAT and will apply when air operators propose any related changes.</i></p> <p>2) A question was raised by Air Operator about the survival equipment of HOFO.</p> <p><i>CAAT has advised that AOC holders specify the survival equipment in the relevant manuals for CAAT approval.</i></p> <p>3) Additional Information from OPS Manager.</p> <p><i>The OPS Manager highlighted the benefit of the LoA, for any types that require CAAT certification, the first submission results in the original LoA. On the second submission, another LoA will be issued, and this process will continue so that one LoA is always available. Therefore, any manual amendment is linked, and the LoA can be incorporated into the LEP of the manual. This means that CAAT will have control over this process.</i></p>

	<p>4) The Air Operator has requested a meeting session on Flight Time Limitations (FTL) in order to ensure a common and consistent understanding. <i>CAAT informed that the Flight Time Limitation (FTL) meeting will be scheduled in the next industry engagement session. Operators may adjust their FTL schemes to align with company practices and operational context, subject to CAAT approval. OPS Manager advise that the adjustments to FTL regulation, whether increases or decreases, are not permitted. However, FTL regulations may be amended where supported by scientific data, regulatory references, or where justified by operational factors such as organizational culture or climatic conditions, in order to ensure suitability for operations</i></p> <p>5) THA has undergone an RNP AR impact, which has prompted a request for CAAT to review the approval process. <i>The OPS manager requests that the operator comply with the TCAR requirement. However, the adoption of best practices by state members of ICAO potentially involving manufacturers and approved organizations, may serve as an appropriate approach during the implementation phase. At present, the CAAT will gather further information to identify which Civil Aviation Authorities are able to assist the CAAT in this matter.</i></p> <p>6) A question was raised by Air Operator about the MEL checklist. <i>CAAT informed that both MEL checklists under TCAR and AO CR concepts are currently being prepared, with issuance at present still under the AO CR concept. However, CAAT requests the operator to resubmit the latest MEL via the EMPIC Transition TCAR-OPS Case in 2025. For TCAR OPS approval, this resubmission will serve as evidence for verification using the TCAR MEL checklist, which was jointly developed by OPS and AIR. The Air Operators shall ensure that any MEL procedures referring to the GMM are fully compliant with TCAR OPS prior to submission to AIR for MEL approval.</i></p> <p>7) Thai Airways’ Remarks <i>THA has expressed to provide advisory on the Pier Support Programme and Fatigue Risk Management System (FRMS) to CAAT and Thai Air Operators.</i></p> <p>All Air Operators acknowledged and no questions or comments were raised during this agenda.</p>
<p><b>Conclusion to the Meeting</b></p>	
	<p>The meeting concluded successfully, with both CAAT and AOC holder representatives achieving a shared understanding of key topics discussed. These included the current status and projected timeline of the TCAR OPS Transition, the immediate next steps required from both the regulator and operators, the Surveillance Plan for the year 2026, and the regulatory concept for Changes Related to an AOC Holder.</p> <p>CAAT informed all participants that the presentation materials used during the meeting would be formally distributed to all AOC holders following the conclusion of the session. To facilitate continuous improvement and gather valuable input from industry stakeholders, a feedback form was made available via QR code</p>

## TCAR OPS Transition and Surveillance Plan Year 2026

displayed during the meeting. The same QR code was subsequently included in the post-meeting correspondence sent to all participants. CAAT respectfully requests that all AOC holder participants take the time to complete the feedback form. A minimum of one response per AOC holder organization is requested to ensure adequate representation and input from across the industry.

Should any AOC holders have further questions, require clarification on any matters discussed, or wish to raise additional issues, CAAT's Flight Operations Standards Department (OPS) remains available to provide support. OPS will coordinate with the respective Principal Operations Inspector (POI) assigned to each AOC holder to facilitate further assistance, guidance, and consultation as necessary.

**Close Meeting Time: 16.00**