



Factsheet

23. December 2025

Conversion of legacy military aircraft Release To Service (RTS) privileges to CHEMAR

1 Introduction

The «Conversion Provisions» published by the European Defence Agency, also known as «Grandfather Rule» (GFR), will provide the rationale to the Swiss MAA (CHEMAA) to issue a CHEMAR 66 military aircraft maintenance license (MAML) to an individual who holds a military Release To Service (RTS) authorization or is undergoing a process to gain such an authorization, at the time the CHEMAR 66 comes into force.

The principle behind the concept of «grandfathering» legacy authorizations is that if current aircraft maintenance certifying staff is deemed to be appropriately qualified within the pre-CHEMAR regulatory system, a change of regulations should not make them incompetent from one day to another.

2 Conversion Report

The issuance of a CHEMAR 66 license through GFR will be based on a «Conversion Report» produced by the Military Maintenance Organization (MMO) and approved by the CHEMAA. This report aims to demonstrate how the legacy authorization held by the applicant is converted into a CHEMAR 66 license, with or without limitations.

Consequently, it is necessary to complete a gap analysis between any legacy authorization and the aimed CHEMAR 66 license category. This analysis should examine the training syllabi, examination standards and experience requirements, identifying differences in the aircraft systems covered, with a view to identifying whether a limitation should be applied to the CHEMAR 66 license basic category, on conversion. The gap analysis should compare the CHEMAR 66 categories A, B1 and B2 syllabi with those of the legacy authorization systems, including the depth or training duration for each subject.

Annex 1 gives an example of a «Conversion Report», that could be used for the issuance of a GFR license.

2.1 Drafting principles or criteria

As GFR criteria will concern various individuals from the regulated community, the GFR criteria will be defined, discussed and agreed in close cooperation between the CHEMAA and the stakeholders concerned.

Indeed, it is of utmost importance that these criteria are clear, realistic, pragmatic, broad and flexible enough to cover all individual cases in order to ensure that nobody will be excluded from the licensing process while ensuring that the proper functioning of the Swiss Air Force will not be hampered. In this regard, the setup of any duration or deadline affecting the application or issuance of a GFR license will also be agreed in close collaboration and properly communicated to the concerned personnel and maintenance organizations of the regulated community.

The GFR will be drafted based on the criteria reported in the following paragraphs.

2.2 Basic Training Requirements

The CHEMAA requests the license applicant to:

- a. demonstrate the successful completion of a basic training related to the concerned CHEMAR 66 category of license, or an equivalent basic training recognized by the CHEMAA;
- b. demonstrate the successful completion of a training recognized by the CHEMAA on the Swiss military airworthiness system and applicable regulations;
- c. demonstrate the successful completion of a Human Factor training, or an equivalent training recognized by the CHEMAA; and
- d. provide supporting documents detailing the concerned basic training with the CHEMAR Form 19 (basic training certificate, examination credit report, details of the basic training syllabus, etc.).

2.3 Type Training Requirements (only for B- and C-licenses)

The CHEMAA requests the license applicant to:

- a. demonstrate the successful completion of the type training related to the CHEMAR 66 type rating to be endorsed on the license, or an equivalent type training recognized by the CHEMAA; and
- b. provide supporting documents detailing the type or model of aircraft concerned with the CHEMAR Form 19 (type training certificate, details of the type training syllabus, etc.).

2.4 Maintenance experience on aircraft

The CHEMAA requests the license applicant to:

- a. demonstrate an appropriate maintenance experience on aircraft related to the concerned CHEMAR 66 category of license, or an equivalent aircraft maintenance experience recognized by the CHEMAA; and
- b. provide supporting documents with the CHEMAR Form 19 (individual logbook, maintenance records detailing the maintenance experience, etc.).

Note: The duration of the required maintenance experience should be based on the category of CHEMAR 66 license concerned. The CHEMAA may also set up a validity date for the maintenance experience to be converted.

3 License limitations

It is likely that legacy authorizations will not entirely align with the CHEMAR 66 categories A, B1 and B2 aircraft trades and therefore limitations may need to be added to the CHEMAR 66 license issued.

Limitations are typically due to a lack of Basic Training between the authorization to be converted. Nevertheless, it is advised that any additional experience gained by the applicant (e.g. aircraft maintenance experience, Type Training, Task Training, etc.) should also be considered, when performing the gap analysis, to compensate for a lack of Basic Training, in order to avoid adding a limitation on the license. Indeed, license limitations will impact the authorized certification scope of the holder and may generate issues within MMOs.

To avoid different interpretations from various individuals or MMOs, the CHEMAA will define together with the stakeholders and manage the list of the limitations that can be endorsed on a license (e.g. ATA codes, generic sentences, etc.).

When identifying the limitations that may be added to a GFR license, the CHEMAA will also consider the measures to remove these limitations, after the license is issued. Depending on the nature or depth of the limitation, on the holder's experience and qualifications and on the CHEMAA policy these limitations may be removed:

- a. after satisfactory examinations, on the topic subject of the limitation, in an CHEMAA approved or a CHEMAA accepted Maintenance Training Organization (MTO);
- b. after satisfactory training, on the topic subject of the limitation, in an environment recognized by the CHEMAA (e.g. MMO); or

- c. after gaining satisfactory maintenance experience, on the topic subject of the limitation, in an environment recognized by the CHEMAA (e.g. MMO).

4 Implementation and transition

At present, the CHEMARs are undergoing the drafting and preparation for publication processes. In the period following the publication of the CHEMARs, a transition period will commence. During this period, stakeholders will have the opportunity to adapt to the new licensing system. During this transition period, a designated date will be defined to allow the involved stakeholders to submit a «Frozen List» to the CHEMAA. This list will contain the staff members who possess RTS privileges at that specified date and are considered to be eligible for GFR according to chapters 2 and 3.

For further information:

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Annex 1 Example «Conversion Report»

<u>Conversion Report</u>				
(for EMAR 66 licence issued with Grandfather Rule)				
Initial licence	Change to licence [1]			
<u>1/ BIO DATA</u>				
Family NAME : [2]	First NAME : [3]			
Date & place of birth : [4]	Nationality : [5]			
Specialty of applicant : [6]	Operating Organisation : [7]			
Name & address of demanding organisation : [8]				
Applicable EMAR 66 Regulation : [9]				
Applicable GFR : [10]				
Category of licence applied : [11]	Type Rating applied : [12]			
PART 66 licence : Yes / No [13]				
PART 66 licence number: [14]				
PART 66 Type Rating owned & licence category :				
Type Rating(s) [15]	Category(ies) [16]			
<u>2/ BASIC TRAINING : [17]</u>				
Category applied	Training/Qualification	Delivered by	Dates	Supporting document(s)
<u>3/ TYPE TRAINING : [18]</u>				
Aircraft Type	Training/Qualification	Delivered by	Dates	Supporting document(s)
<u>4/ MAINTENANCE EXPERIENCE (on aircraft) : [19]</u>				
Function/position - Nature	Dates / Duration	Supporting document(s)		
<u>5/ HUMAN FACTOR TRAINING :</u>				
[20]				
<u>6/ MILITARY AVIATION LEGISLATION TRAINING :</u>				
[21]				
<u>7/ LICENCE LIMITATION(S) :</u>				
[22]				

8/ LICENCE EXTENSION(S) : [23]

Extension applied	Supporting document(s)

9/ ADDITIONAL INFORMATION :

[24]

- 1 : Strike out if not applicable
- 2 : Indicate Family NAME of the applicant in capital letters.
- 3 : Indicate First NAME of the applicant.
- 4 : Indicate date & place of birth (City/Country).
- 5 : Indicate nationality of the applicant.
- 6 : Indicate specialty/trade of the applicant (e.g. airframe / powerplant / avionics / armament / ...).
- 7 : Indicate name of the Operating Organisation employing/in link with the applicant.
- 8 : Indicate name & address of the Maintenance Organisation.
- 9 : Indicate applicable EMAR Edition used as a basis for the application .
- 10 : Indicate applicable GFR version used as a basis for the conversion
- 11 : Indicate Category of licence applied (A / B1 / B2 / C).
- 12 : Indicate Type Rating(s) applied.
- 13 : Strike out if not applicable .
- 14 : If the applicant owns a PART 66 licence, indicate its number.
- 15 : If applicable, indicate PART 66 Type Rating(s) owned : aircraft & engine(s).
- 16 : Indicate PART 66 category(ies) associated with the Type Rating.
- 17 : Details of trainings of the applicant & indicate nature of supporting documents.
- 18 : Details of trainings of the applicant & indicate nature of supporting documents .
- 19 : Details of maintenance experience on aircraft of the applicant, appropriate to the category of licence applied, precise durations.
- 20 : Indicate supporting documents provided (e.g. training certificate) & date of the training.
- 21 : Indicate supporting documents provided (e.g. training certificate) & date of the training .
- 22 : If applicable, precise the limitations proposed to be endorsed on the licence. Any limitations on PART 66 licence are to be reported on the licence to be issued.
- 23 : If applicable, precise the extensions proposed to be endorsed on the licence & provide appropriate supporting documents.
- 24 : Indicate any complementary information to be taken into account to issue the licence. In particular, if a training was acquired in a non-approved PART or EMAR 147 MTO. Provide precise content of the training delivered.