



Documentation Update

ASA Quality Committee Meeting

June 4, 2023

Orlando, FL



US-UK, US-EU, and UK-EU Acceptance of Documentation

- New parts
- All three jurisdictions accept new parts with the appropriate authorized release document from the other two jurisdictions
- Maintained Parts
 - US-UK MIP and MAG provides a path for repair stations to obtain both approvals
 - US-EU MIP and MAG provides a path for repair stations to obtain both approvals
 - EU and UK each require repair stations in the other jurisdiction to apply as direct “foreign repair stations”

Tips When Selling Overhauled Parts to EU/UK

(Look carefully at the tags to ensure that they meet the importing nation's standards)



When shipping an EASA Form 1 to the UK

- EASA Form 1 issued by March 31, 2022 remains acceptable
- Otherwise, confirm that the EU maintenance organization had applied for a UK approval by 31 March 2022 and/or held a UK approval at the time of the work

When shipping a UK CAA Form 1 to the EU

- EASA Form 1 issued by a UK 145 by December 31, 2020 remains acceptable
- After December 31, 2020, UK based 145s must hold EASA 145 approval to issue EASA Form 1
- EASA accepts EASA Form 1 but **not UK CAA Form 1**

Selling UK-Overhauled Parts Get the Form Right for the Customer



- The FAA will accept overhaul tags from a UK-based FAA Part 145 repair station:
 - 8130-3 as a single release
 - UK CAA Form 1 as a dual release
 - Under the FAA-EASA MIP, the FAA accepts EASA Form 1 from repair stations located within the European Union
- BUT EASA will only accept an EASA Form 1 that was issued by a UK-based repair station



Japanese Changes

- Previously, JCAB strictly enforced authorized release certificate requirements for critical parts
- Starting June 18, 2022 JCAB strictly enforces authorized release certificate requirements for substantially all parts

Japanese Documentation Requirements for New Aircraft Parts



- JCAB accepts foreign certificates from contracting ICAO states. This includes certificates for airworthiness.
 - JCAB explicitly accepts 8130-3 tags issued by DMIRs and DARs
 - JCAB explicitly accepts 8130-3 tags issued by PAHs (PC/PMA/TSOA) and their authorized direct shipment suppliers
 - JCAB explicitly accepts EASA Form 1 issued by a POA or ETSOA holder
- A single authorized release certificate can be attached to a set of new parts (e.g. a kit)

Japanese Documentation Requirements for Maintained Aircraft Parts



- JCAB accepts maintenance release certificates from bilateral partners (currently only three) and their foreign approval holders
 - JCAB explicitly accepts maintenance performed by repair stations certificated by
 - Canada
 - Singapore
 - Russia
 - Japan is negotiating maintenance agreements with the US, the UK, and the EU
 - JCAB expects foreign repair stations to obtain JCAB foreign repair station approval
 - Japanese air carrier MAY be permitted to accept foreign maintenance under their JCAB-approved manuals

Japanese Documentation Requirements for Standard Parts



- JCAB follows a standards parts acceptance model very similar to the US acceptance model
- JCAB accepts standard parts that meet public standards (e.g. NAS, AN, SAE, ANSI, AS etc.)
- JCAB does not accept proprietary standards as standard parts unless:
 - They also conform to a public standard or
 - They come from the EU and have been designated standard by EASA
- A C of C is sufficient for these articles.

Chinese Documentation Requirements for Aircraft Parts



- **New Parts**
- Must include the documentation required under the appropriate bilateral agreement
 - Example: parts from a US production approval holder must bear an 8130-3
 - Example: parts from an EU POA must bear an EASA Form 1 issued by the POA
- Standard parts and raw materials must include the manufacturer's certificate of conformity
- When buying parts from a distributor, the distributor shall be accredited by one of the CAAC-recognized organizations:
 - CAMAC: ASP-R5
 - ASA: ASA-100 revision 5.0



Chinese Documentation Requirements for Aircraft Parts

- **Used Parts**
- As a condition of being accepted by a CCAR-145 organization
 - Must have been removed by a CCAR-145 organization
 - Must bear a removal tag consistent with the CAAC template
 - Must be found in the removed parts database
- As a condition of being installed on an operator's Chinese-registered aircraft
 - Must bear an AAC-038 before being installed
 - Must be found in the removed parts database

Other Documentation Required by CAAC



- In addition to the other certificates and markings, any aircraft component shall also have the following records, as applicable:
 1. Implementation status of airworthiness directives;
 2. The execution status of the service announcement;
 3. Time limit/cycle life;
 4. Shelf-life data limitations, including date of manufacture or vulcanization date;
 5. Where there are specific storage requirements, records to show that during the storage period, the storage requirements were followed;
 6. Missing parts of components or kits;
 7. Abnormal situations that have occurred in the past, such as: overload, unexpected termination of use, excessive heat, major failure or accident.

CAAC AC 120-FS-058 R3 § 6.5



New FAA Guidance Out for Comment

- AC 21-DAC, Destroyed and Scrapped Aircraft
- https://cms.faa.gov/aircraft/draft_docs/ac/ac_21_dac
- Comments Due June 16, 2023

- Guidance on the evaluation of damaged aircraft and permits FAA to declare an aircraft has been destroyed
- This is similar in language to FAA Order 8100.19 – the difference is that the Order is NOT public guidance
- Applies at the aircraft level, but could be extrapolated to the parts level
- **DANGER:** Allows FAA employees to exercise judgment about whether an aircraft is repairable *instead of relying on the airworthiness standards*
 - Such judgment automatically de-registers the aircraft
 - Ignores the industry burden to identify repair methods
 - Shifts the burden to the private sector to appeal the judgment

Deregistration for destruction is inferred under the US Code if the thing is no longer an aircraft



- 49 USC 44105: The FAA may suspend or revoke a certificate of registration when the aircraft no longer meets the requirements of section 44102 of this title.
- 49 USC 44102: An aircraft may be registered only when the aircraft is—
 - (1) not registered under the laws of a foreign country and is owned by—
 - (A) a citizen of the United States;
 - (B) an individual citizen of a foreign country lawfully admitted for permanent residence in the United States; or
 - (C) a corporation not a citizen of the United States when the corporation is organized and doing business under the laws of the United States or a State, and the aircraft is based and primarily used in the United States; or
 - (2) an aircraft of—
 - (A) the United States Government; or
 - (B) a State, the District of Columbia, a territory or possession of the United States, or a political subdivision of a State, territory, or possession.

Deregistration for destruction is explicit at the regulatory level



- 14 CFR 47.41: Each Certificate of Aircraft Registration, AC Form 8050–3, issued by the FAA under this subpart is effective, unless registration has ended by reason of having been revoked, canceled, expired, or the ownership is transferred, until the date upon which one of the following events occurs:
 - ***
 - (2) The aircraft is totally destroyed or scrapped.



Case Law On Point

- An aircraft is considered totally destroyed by an accident when the value of the aircraft is zero. *Reynolds v. Bank of America National Trust and Sav. Ass'n*, 335 P.2d 741 (Cal. App. 1959)
- “Whether the aircraft actually was destroyed or merely damaged is a question for the trial court to decide upon the evidence presented by the parties. We cannot resolve that factual issue at this stage in the proceedings” *Executive Jet Aviation, Inc. v. U.S.*, 507 F.2d 508 (6th Cir. 1974)



Do You Have Problems Obtaining 8130-3 Tags?

Are US PAH manufacturers issuing new parts without 8130-3 Tags?

Are there enough DARs out there?



Thank You

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