

Review Concerning the use of EASA Form 1 and UK CAA Form 1 - Including Block 12

Sofema Aviation Services (SAS) www.sassofia.com considers issues related to EASA / UK Form 1 Certification

Introduction

The European Union Trade and Cooperation Agreement (EU-UK) states; “The importing Party shall recognize the production certification and production oversight system of the exporting Party since the system is considered sufficiently equivalent to the system of the importing Party” (source: Article 21 of Annex 30 of the Trade and Cooperation Agreement).

From the UK Perspective

All EASA certificates, approvals and licenses in effect on the Withdrawal Date December 31, 2020 for use in the UK aviation system and on UK-registered aircraft will be recognised by the CAA for up to two years.

Previously, EASA Form 1s were issued by UK organisations to confirm that a product, part or component was manufactured in accordance with approved design data. Following the Withdrawal Date (December 31, 2020), UK CAA-approved organisations will now issue a UK CAA Form 1 in place of an EASA Form 1.

A CAA Form 1 is nearly identical in content and layout to the EASA Form 1 and is to be completed in accordance with the existing instructions - the Acceptable Means of Compliance and Guidance Material - used for EASA Form 1s. The CAA adopted the latter as its policy with regard to compliance with the relevant UK law from January 1, 2021. The only difference is the authority information in the header has changed and the form reference itself is now a CAA Form 1.

From 1 April 2022, UK owners/operators cannot accept EASA Form 1s dated after that point as acceptable documents for the certification of maintenance on engines and/or components from EU/EASA organisation that have not applied to the CAA for an approval by 31 March 2022. EASA Form 1s issued by an EU/EASA approved production organisation for a new engine or component can continue to be accepted without restriction in accordance with the UK/EU Trade and co-operation agreement.

<https://www.gov.uk/government/publications/agreements-reached-between-the-united-kingdom-of-great-britain-and-northern-ireland-and-the-european-union>

From EASA Perspective

The UK-EU Trade and Cooperation Agreement recognizes the CAA Form 1 for the export of new parts, appliances, engines, and propellers and CAA Form 52 for the export of new complete aircraft.

Therefore, there is no need for UK-based organisations to hold an EASA Third Country Production Organisation Approval. Consequently, EASA has not issued any Third Country POA to organizations in the UK and as such, there are no EASA.UK.21G.XXXX approvals. (Source: CAA and EASA)

As regards design and production organisations located in the UK they are governed by the trade and cooperation Agreement between the EU and the UK. For production, the agreement provides for mutual recognition of the production certifications and production oversight systems.

For Design, whilst the agreement does not provide for mutual recognition of any certificates, it does allow for certain amount of simplification in the acceptance or validation of such certificates.

For Maintenance Release

Individually identifiable components for which a UK certified maintenance organisation issued an 'EASA Form 1' and placed them on the market before January 1, 2021 can continue to be used and fitted on an aircraft registered in an EASA Member State also after that date, unless the part or other component has been damaged or not stored in accordance with the EU aviation safety requirements.

This is foreseen by Article 41 of the EU-UK Withdrawal Agreement.

Note An 'EASA Form 1' is only a statement of airworthiness at the time of its issue, and, as stated in Appendix II to Part-M of Regulation (EU) No 1321/2014, 'EASA Form 1' "does not constitute approval to install the item on a particular aircraft, engine, or propeller but helps the end user determine its airworthiness approval status". It is therefore the ultimate responsibility of the user or installer to make this installation decision.

Effective December 31, 2020, the UK based maintenance organisation must hold an EASA Part 145 approval in order to be able to continue issuing 'EASA Form 1' for components which are to be fitted on an aircraft registered in an EASA Member State.

EASA Form 1 Block 12 Considerations

Block 12 Remarks

Describe the work identified in Block 11, either directly or by reference to supporting documentation, necessary for the user or installer to determine the airworthiness of item(s) in relation to the work being certified. If necessary, a separate sheet may be used and referenced from the main EASA Form 1. Each statement must clearly identify which item(s) in Block 6 it relates to.

Examples of information to be entered in block 12 are:

- (i) Maintenance data used, including the revision status and reference.
- (ii) Compliance with airworthiness directives or service bulletins.

- (iii) Repairs carried out.
 - (iv) Modifications carried out.
 - (v) Replacement parts installed.
 - (vi) Life limited parts status.
 - (vii) Deviations from the customer work order.
 - (viii) Release statements to satisfy a foreign Civil Aviation Authority maintenance requirement.
 - (ix) Information needed to support shipment with shortages or re-assembly after delivery.
- (x) For maintenance organisations approved in accordance with Subpart F of Annex I (Part-M) or Annex Vd (Part-CAO), the component CRS statement referred to in point [M.A.613](#) and [CAO.A.070](#), as applicable:

“Certifies that, unless otherwise specified in this block, the work identified in block 11 and described in this block was accomplished in accordance with the requirements of Section A, **Subpart F of Annex I (Part-M)** or Annex Vd (Part-CAO) to Regulation (EU) No 1321/2014, and in respect to that work the item is considered ready for release to service.

THIS IS NOT A RELEASE UNDER ANNEX II (PART-145) TO
REGULATION (EU) No 1321/2014."

If printing the data from an electronic EASA Form 1, any appropriate data not fit for other blocks should be entered in this block.

UK CAA FORM 1 Block 12 Considerations (Highlighted differences from EASA)

GM to Appendix II to Part-M — Use of the CAA Form 1 for maintenance

CAA FORM 1 BLOCK 12 'REMARKS'

- The CAA Form 1 identifies the airworthiness status of an aircraft component in relation to the work being certified. Block 12 'Remarks' of the CAA Form 1 in some cases contains vital airworthiness- related information (see also Appendix II to Part-M) which may need appropriate and necessary actions.
- Examples of data to be entered in this block as appropriate:
 - Maintenance documentation used, including the revision status, for all work performed and not limited to the entry made in block 11. **A statement such as 'in accordance with the CMM' is not acceptable.**
 - **NDT methods with appropriate documentation used when relevant.**
 - Compliance with airworthiness directives or service bulletins.
 - Repairs carried out.
 - Modifications carried out.
 - Replacement parts installed.
 - Life-limited parts status.

- **Shelf life limitations.**
- Deviations from the customer work order.
- Release statements to satisfy a foreign civil aviation authority maintenance requirement.
- Information needed to support shipment with shortages or re-assembly after delivery.
- **References to aid traceability, such as batch numbers.**

GM to Appendix II to Part-M — Use of the CAA Form 1 for maintenance

Next Steps

Sofema Aviation Services (www.sassofia.com) and Sofema Online (www.sofemaonline.com) provide EASA Regulatory Compliant and vocational Training Courses as Classroom, Webinar or Online. For additional information please see the websites or email team@sassofia.com