

**Safety Regulation Group**  
Airworthiness Strategy and Policy

1 October 2010

**Proposal to Amend the Maintenance Requirements in BCAR Section A, in addition to changes to the ANO to introduce non-expiring Certificates of Airworthiness and National Airworthiness Review Certificates.**

Dear Sir or Madam,

Following a Regulatory Review of General Aviation and taking account of the introduction of European Commission Regulations which affect much of the General Aviation community, the CAA has concluded that to continue with the present National requirements alongside joint EC rules, represents a significant regulatory and financial burden to industry.

With the introduction of Commission Regulation (EC) 2042/2003, Part M, subparts F and G, the majority of light aviation organisations now hold a Part M approval, although many continue to hold privileges for National aircraft. To avoid the need for organisations to comply with two separate sets of requirements, and so simplify the processes used by organisations the CAA is pleased to propose a revised set of requirements for the maintenance and continuing airworthiness of 'non-EASA' aircraft, reflecting the style of those regulations already used by the European Aviation Safety Agency (EASA). As part of its review, the CAA considered adopting the EASA requirements en-bloc but opted instead for the attached proposals to provide flexibility for the particular needs of Annex II aircraft.

These revisions will replace existing requirements and will provide a simplified set of requirements for the maintenance and continued airworthiness of the non-EASA aircraft, including State aircraft and aircraft which comply with Annex II of the EASA Regulation. The intention throughout, is to introduce requirements that align with the current EASA system, to avoid duplication where possible and so reduce regulatory burden and cost. Further, it is our intention that the change over will cause the minimum of impact on existing approval holders and the change from one approval to another will be as simple as possible.

The introduction of these revised requirements will necessitate changes to the Air Navigation Order, to introduce a non-expiring certificate of airworthiness and a UK National airworthiness review certificate, to produce a system similar to that already in use for those aircraft operating within the EASA system. It is planned that transition to the new requirements will be over a 3 year period starting at the date of publication of the new requirements, with publication presently scheduled to be no earlier than Spring 2011.

The changes being made to BCAR Section A and the ANO are substantial. This has necessitated the writing of an annex to this covering letter to explain the detail of the proposals. The complete consultation package, including the explanatory annex, the new and amended BCAR A chapters, the ANO changes and the impact assessment may be found at <http://www.caa.co.uk/Consultations>

A distribution list for this consultation letter is attached. If you know of any other organisation or individuals who you believe should comment and who are not included on the list, please encourage them to visit the CAA website and provide their comments.

Please send any comments you may wish to make regarding the proposal to [requirements@caa.co.uk](mailto:requirements@caa.co.uk) by 24 December 2010, if no response is received from your organisation, it shall be assumed that you are in agreement with the proposal.

We are keen to ensure that organisations and owners having an interest in these changes have the fullest opportunity to comment on the proposed changes, and if you have any concerns or questions, please call me on 01293 573062 and I will do my best to help.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Graham Owers', with a horizontal line underneath the name.

Graham Owers  
Manager, UK Airworthiness Rulemaking