

Consultation Reply Document:

Legislation for new types of Vertical Take-Off and Landing (VTOL) aircraft

Part C: Continuing Airworthiness

CAP3318C

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PART C

Continuing Airworthiness

Summary

In our consultation (CAP 3267C) we set out our policy position that the current continuing airworthiness framework and requirements are well established and suitable for new types of VTOL aircraft. We explained that, following the consultation carried out in late 2025 and early 2026 (CAP 3186), we decided to take forward our proposal that only minimal changes should be made to the Continuing Airworthiness Regulation (UK Regulation (EU) 1321/2014), amending the regulations only where necessary to accommodate Powered-Lift and Non-Conventional Helicopters. We explained that this approach would ensure new types of VTOL aircraft are subject to the same high maintenance standards and level of oversight as applies to existing aircraft.

We set out the specific regulatory changes we are proposing, explaining that these would affect continuing airworthiness tasks, complex maintenance tasks, maintenance implementation procedures, pilot-owner maintenance and continuing airworthiness organisations. We noted that the changes also include amendments required to align with the CMPA proposals set out in Part B, as well as other changes to UK Regulation (EU) No 1321/2014 currently being progressed under [RMT.0201](#) (such as the addition of the electric powerplant to the engineer's licensing requirement).

The CAA is recommending the introduction of a new aircraft, **Multicopter**, to replace the proposed Non-Conventional Helicopter term and definition. Alongside **Powered Lift**, this would create two distinct VTOL categories based on the primary method by which lift is generated. Details of this change can be found in Part A to this CRD. In response to the following questions, Multicopter is used instead of Non-Conventional Helicopter. Note that some comments made specific reference to Non-Conventional Helicopter, for clarity these references have been kept and are marked with a (*)

Article 3 – Continuing Airworthiness Requirements

Consultation proposal: We set out our proposal to amend Article 3 to clarify that, for the purposes of the Continuing Airworthiness Regulation, the term 'aircraft' should be read to include both new types of VTOL. We proposed that requirements applying to aeroplanes should be read to apply to Powered-Lift, and requirements applying to helicopters (and rotorcraft) should be read to apply to Multicopters, unless expressly stated otherwise. We explained that the effect of these modifications would be that all existing continuing airworthiness requirements for aircraft, aeroplanes and helicopters will apply to the new types of VTOL.

We set out that express references to Powered-Lift or Multicopters would only be made where specific requirements apply only to those types of aircraft, or where we intend them

to be treated differently from conventional aeroplanes and helicopters. We explained that where the CAA has exercised its discretion to classify a Powered-Lift or Multicopters as non-CMPA, the requirements of Part-ML would apply in accordance with paragraph 2 of Article 3.

We asked: Do you agree or disagree with our proposed changes to Article 3 Continuing airworthiness requirements?

Summary of responses: We received 11 responses to this question. Of these, five respondents strongly agreed and four respondents somewhat agreed. No respondents neither agreed nor disagreed, and one respondent somewhat disagreed. One respondent strongly disagreed.

Comments in support of the proposals highlighted the following reasons:

- Respondents supported bringing Powered-Lift and Non-Conventional Helicopters(*) clearly within the continuing airworthiness framework.
- Several welcomed use of existing aeroplane and helicopter requirements as a starting point.
- Supporters considered the approach necessary to avoid legal uncertainty for new VTOL aircraft types.

Comments opposing the proposals highlighted the following reasons:

- Some felt the read-across from aeroplane or helicopter rules may not always fit novel VTOL aircraft.
- Concerns were raised around terminology, particularly the relationship between “helicopter” and “rotorcraft”.
- Some respondents wanted more recognition of light powered-lift aircraft and proportionate continuing airworthiness pathways.

Other comments raised include:

- Respondents asked for guidance on aircraft that combine wing-borne and rotor-borne characteristics.
- Several highlighted the importance of operational learning and ICA updates after entry into service. Some comments requested greater clarity on how aircraft-specific requirements will be identified.

Our view: The CAA’s approach to include these new aircraft into the current CAW regime provides a well-established, known airworthiness framework. The proposed amendments reflect areas in the regulations where the CAA has identified the need for VTOL specific items as not all items fully reflect the requirements for VTOL. The current regulations provide a proportionate pathway for light aircraft and this was seen as appropriate for light Powered Lift and Multicopters rather than introducing a VTOL specific set of requirements.

Annex I (Part M)

M.A.301: Continuing Airworthiness Tasks

Consultation proposal: We set out our proposal to amend the continuing airworthiness tasks in M.A.301 to make clear that these include requirements relating to new technologies for electric VTOL, specifically requirements relating to lift/thrust units and high-energy storage and distribution systems. We proposed to use wording that is not specific to electric power, so that this provision can be applied to and enable new technologies as they develop. We noted that this proposed amendment relates to both [RMT.0201](#) and this consultation, and is intended to apply to both existing electric-powered aircraft and the new Powered-Lift and Multicopters.

Appendix VII: Complex Maintenance Tasks

Consultation proposal: We set out our proposals to add new items to the list of complex maintenance tasks in Appendix VII (referenced in M.A.801(b)), which require an approved organisation to issue the Certificate of Release to Service. We explained that these are tasks deemed by their content or complexity not to be within the scope or capability of a pilot-owner or independent certifying staff. Specifically, we proposed:

- New points 3a and 3b - maintenance on the power plant that would require disassembly of engine(s), main batteries or fuel cell(s) (point 3a), and maintenance on high-pressure reservoirs and components belonging to high-pressure lines or systems related to the power plant (point 3b). We explained that point 3a accounts for maintenance on future powerplants such as electric powerplants not currently covered under existing wording, and point 3b accounts for high-pressure systems that may be added for technology such as hydrogen-powered aircraft.
- New point 4a - specific complex maintenance tasks for Powered-Lift and Multicopters, including: removal/installation of lift or thrust units or primary structural interfaces; opening, repair or replacement of high-energy storage modules (including battery module stacks and associated thermal management) and primary high-voltage distribution harnesses; rigging, tracking or control-law parameter changes associated with coordinated multi-rotor lift/thrust units; and any maintenance action identified by the type certificate holder as safety-critical for Powered-Lift or Multicopter configurations.

We explained that these proposed new items are critical to the safe operation of the aircraft, would require specialised tooling, equipment or facilities, and potentially require to be carried out by more than one person.

We asked: Do you agree or disagree with our proposed changes to Annex I (Part M), including the changes to Appendix VII?

Summary of responses: We received 10 responses to this question. Of these, six respondents strongly agreed and two respondents somewhat agreed. One respondent

neither agreed nor disagreed, and no respondents somewhat disagreed. One respondent strongly disagreed.

Comments in support of the proposals highlighted the following reasons:

- Respondents supported including lift/thrust units, high-energy storage and distribution systems, and flight control parameters in complex maintenance considerations.
- Many agreed that safety-critical VTOL maintenance tasks require specialist competence and oversight.
- Supporters welcomed updating traditional maintenance concepts to reflect electric and distributed propulsion systems.

Comments opposing the proposals highlighted the following reasons:

- Some felt the proposals risk treating all battery, motor or rotor replacement tasks as complex, even where modular design makes them routine.
- Concerns were raised that excessive certification or inspection requirements could increase cost and reduce aircraft availability.
- Respondents asked for clearer distinction between safety-critical components and genuinely complex maintenance tasks.

Other comments raised include:

- Several respondents asked for guidance on how type certificate holders should identify safety-critical tasks. Digital maintenance information, battery health monitoring and software configuration control were highlighted.
- Some respondents suggested requirements should evolve as operational experience demonstrates task maturity.
- The inclusion of batteries, motor and rotor replacements reflects the safety-critical nature. These items should be maintained in an appropriate environment of an approved organisation with more than one person.

CAA view: We propose to continue with the approach that has been put forward in that new tasks will be added to the list of complex maintenance tasks. These additional tasks for Powered-Lift and Multicopters are those that must be performed and released by certifying staff of an approved maintenance organisation. Release by independent certifying staff or by the pilot owner is not seen as appropriate or safe on what are seen as critical items.

Annex Vb (Part ML)

ML.1 - Scope of Part-ML

Consultation proposal: We set out that the intention is for Part-ML to apply to Powered-Lift and Multicopters where the CAA has exercised its discretion to classify them as non-CMPA. We explained that no express amendment is required to achieve this effect in point ML.1, since references to 'aeroplanes' are intended to include Powered-Lift and references to 'rotorcraft' are intended to include Multicopters, in accordance with new Article 3(1)(a). We set out that the intended effect is that the less onerous maintenance requirements in Part-ML will apply to new types of VTOL classified as non-CMPA, rather than the exacting requirements laid out in Part-M.

ML.A.302 - Aircraft Maintenance Programme

Consultation proposal: We set out our proposal to amend ML.A.302 to make clear that the Minimum Inspection Programme (MIP) will not apply to Powered-Lift or Multicopters. We explained that, given the differing design approaches, technology and materials anticipated to be used in these aircraft types, a MIP would not be appropriate. Instead, we proposed that the maintenance programme for any new type of VTOL should follow the Design Approval Holder's (DAH) instructions and be established in reliance on specific data provided by the DAH.

Appendix II - Limited Pilot-Owner Maintenance

Consultation proposal: We set out minor editorial text changes to the pilot-owner maintenance provisions in Appendix II.

Appendix III - Complex Maintenance Tasks Not to Be Released by the Pilot-Owner

Consultation proposal: We set out proposals to add new items to Appendix III, mirroring the additions to Appendix VII in Part-M. We proposed new points ca and cb (maintenance on future powerplants such as electric powerplants and on high-pressure systems for technology such as hydrogen-powered aircraft), and new point da (specific complex maintenance tasks for Powered-Lift and Multicopters). We explained that these tasks are deemed by their content or complexity not to be within the scope or capability of a pilot-owner, are critical to the safe operation of the aircraft, and may require specialised tooling, equipment and facilities and more than one person to carry out.

We asked: Do you agree or disagree with our proposed changes to Annex Vb (Part ML)?

Summary of responses: We received nine responses to this question. Of these, four respondents strongly agreed and three respondents somewhat agreed. One respondent neither agreed nor disagreed, and no respondents somewhat disagreed. One respondent strongly disagreed.

Comments in support of the proposals highlighted the following reasons:

- Supporters welcomed making Part-ML available to eligible Powered-Lift and Non-Conventional Helicopters.(*)

- Several saw Part-ML as an appropriate proportional framework for non-complex aircraft outside commercial air transport.
- Respondents agreed that maintenance programmes should be based on DAH instructions rather than generic minimum inspection programmes.

Comments opposing the proposals highlighted the following reasons:

- Some respondents questioned whether Part-ML weight thresholds align properly with the proposed non-CMPA criteria.
- Concerns were raised that access to Part-ML remains dependent on discretionary non-CMPA classification.
- Some manufacturers argued that modular maintenance tasks should not automatically be treated as complex.

Other comments raised include:

- Respondents asked for harmonisation of MTOM thresholds across Part B and Part C.
- Several wanted clarity on how operators and CAMOs will access current technical and reliability data.
- Digital ICA and stronger lifecycle support from the type certificate holder were suggested.

CAA view: The CAA will continue with the proposals that were put forward in relation to Annex Vb (Part ML). The applicability of Part ML to a Powered Lift or Multicopter will be determined by whether that aircraft has been approved under the CMPA discretion process, not merely by whether it falls under a set weight threshold. We have given serious consideration to the appropriate weight limit threshold for the discretion and have chosen 1,200kg for the reasons set out in Part B. Part ML is seen as an appropriate regime for a VTOL that is approved under the discretion process.

Part ML is only available for non-CMPA aircraft. The CAA's proposed approach with the CMPA discretion will place those VTOL aircraft approved under the discretion within Part ML without the need for any changes to the Regulations. The change to Article 3 will put them under the aeroplane or helicopter requirements as appropriate.

Annex Vd (Part CAO) – CAO.A.020: Terms of Approval

Consultation proposal: We set out our proposal to amend CAO.A.020 to exclude Powered-Lift and Multicopters, along with their relevant engines and motors, from the scope of work for a Part-CAO organisation that employs only one person for both planning and carrying out of all maintenance tasks. We explained that these aircraft and engines are deemed by their content and complexity not to be within the scope or capability of a single-person organisation, and that new types of VTOL will require specialised tooling, equipment and possible facilities, and will require more than one person for maintenance.

We also proposed amendments to account for complete electric engines and future powerplants such as hybrid, hydrogen and fuel cell systems within the engine-rated organisation scope.

We asked: Do you agree or disagree with our proposed changes to Annex Vd (Part CAO)?

Summary of responses: We received 10 responses to this question. Of these, six respondents strongly agreed and three respondents somewhat agreed. No respondents neither agreed nor disagreed, and no respondents somewhat disagreed. One respondent strongly disagreed.

Comments in support of the proposals highlighted the following reasons:

- Respondents agreed that Powered-Lift and Non-Conventional Helicopters(*) may require more organisational capability than a one-person CAO.
- Supporters considered additional oversight proportionate given high-voltage systems, batteries, software and propulsion complexity.
- Several welcomed using Part-CAO where appropriate while maintaining safeguards for novel aircraft systems.

Comments opposing the proposals highlighted the following reasons:

- Some respondents thought the exclusion from one-person CAO privileges may be too broad.
- Concerns were raised that certain structures or routine tasks may not differ significantly from conventional aircraft.
- Some suggested privileges could be scoped by system or task rather than excluded entirely.

Other comments raised include:

- Respondents recommended periodic review as experience with VTOL maintenance develops.
- Infrastructure respondents noted that urban operating sites should not be assumed to function as maintenance bases.
- Several emphasised the need for specialist tooling, procedures and training.

CAA view: As the CAA considers that with the technology included within an eVTOL aircraft, in particular the high energy battery packs, from a personal safety position the CAA does not believe that the use of the one-person Part CAO privilege is suitable. Other than that, these aircraft should be treated no differently from a conventional aircraft. For aircraft that have been approved under the CMPA discretion, the use of the Part CAO organisation is appropriate for these new aircraft.

The CAA approach is to include these aircraft in the current Regulations, and only making amendments where specifically needed. This will ensure that existing Part CAO organisations are able to support the new aircraft with the minimum of changes to their organisation approval, adding the aircraft alongside existing aircraft types. Having specific requirements and structure for an approval to manage and maintain VTOL was not seen as appropriate.

Next Steps

Having considered the consultation responses, the CAA intends to proceed with the proposed continuing airworthiness framework. The responses have reinforced the view that existing continuing airworthiness regulations provide an appropriate foundation for regulating new VTOL aircraft, while targeted amendments are necessary to address emerging technologies and unique aircraft characteristics.

The CAA will:

- Proceed with the proposed amendments to Article 3, ensuring Powered-Lift and Multicopter aircraft are clearly brought within the scope of the continuing airworthiness framework.
- Proceed with amendments to Part-M and Part-ML relating to high-energy storage systems, lift/thrust units, complex maintenance tasks and maintenance programme requirements.
- Continue to require that identified safety-critical maintenance tasks are performed and released by appropriately approved maintenance organisations.
- Retain the proposed Part-CAO limitations for VTOL aircraft where additional organisational capability is considered necessary to manage the associated technologies and risks.
- Develop supporting guidance material where required to clarify the application of the regulations to novel aircraft configurations, maintenance practices and future technological developments.
- Continue to review the regulatory framework as operational experience with VTOL aircraft develops, ensuring requirements remain proportionate while maintaining an appropriate level of safety.

ANNEX 1

Abbreviations

AAM – Advanced Air Mobility

AMC – Alternative Means of Compliance

AIP – Aeronautical Information Publication

ATM – Air Traffic Management

CAMO – Continuing Airworthiness Management Organisations

CAT – Commercial Air Transport

CMPA – Complex Motor-Powered Aircraft

CS FCD – Certification Specific Flight Crew Data

DfT – Department for Transport

EASA – European Union Aviation Safety Agency

GM – Guidance Material

ICAO – International Civil Aviation Organisation

IFR – Instrument Flight Rules

ISMS – Information Security Management System

MCC – Multi-Crew Cooperation

NASP – National Aviation Security Programme

NAA - National Aviation Authorities

OEM – Original Equipment Manufacturer

OSD – Operational Suitability Data

OLS – Obstacle Limitation Surfaces

PPL – Private Pilot's License

RFFS – Rescue and Fire Fighting Service

SMS – Safety Management System

VFR – Visual Flight Rules

VTOL – Vertical Take-off and Landing

ANNEX 2

Summary of Questions

Question 1: Do you agree or disagree with our proposed changes to Article 3 Continuing airworthiness requirements? Please explain your answer.

Question 2: Do you agree or disagree with our proposed changes to Annex I (Part M), including the changes to Appendix VII? Please explain your answer.

Question 3: Do you agree or disagree with our proposed changes to Annex Vb (Part ML)? Please explain your answer.

Question 4: Do you agree or disagree with our proposed changes to Annex Vd (Part CAO)?