WHO QUALIFIES AS THE MANUFACTURER OF AN LSA?

Only the person who designs and produces a light-sport category aircraft (LSA) and has the personnel and documentation to show compliance with all applicable requirements under 14 CFR parts 21 and 22 is the manufacturer of that LSA. This is important, for example, because only the manufacturer may complete and sign a statement of compliance for an LSA.

HOW DO LSA AND EXPERIMENTAL LSA GET "CERTIFIED"?

FAA does not issue design or production approvals for light-sport category aircraft (LSA) or experimental LSA. The FAA certifies these aircraft via issuance of airworthiness certificates to individual aircraft under the following provisions.

14 CFR Section	Purpose of Airworthiness Certificate		Original Issuance	Recurrent Issuance
21.190	Issuance of a special airworthiness certificate for a factory-built LSA that meets applicable, FAA-accepted industry consensus standards		Yes	Yes
21.191	Experimental	Experimental airworthiness certificate for operating--		
21.191(i)(1)		Light-sport aircraft that exceeds the provisions of 14 CFR 103.1 for ultralight vehicles	Not after 1/31/2008	Yes*
21.191(i)(2)		Kit-built light-sport aircraft	Not after 10/22/2025	Yes*
21.191(i)(3)		Former light-sport aircraft	Not after 10/22/2025	Yes*
21.191(k)		Kit-built light-sport category aircraft	Yes	Yes
21.191(l)		Former light-sport category aircraft	Yes	Yes

*If a recurrent airworthiness certificate is to be issued for an aircraft that was originally certificated under 14 CFR 21.191(i), the recurrent certificate is also issued under 14 CFR 21.191(i).

HOW DO MANUFACTURERS WORK WITH THE FAA ON CERTIFICATION OF LSA?

Certification procedures for light-sport category aircraft (LSA) do not involve applying for or obtaining design or production approvals. Manufacturers must ensure compliance with the applicable FAA-accepted consensus standards and provide a statement of compliance (SOC) for each new aircraft or new aircraft kit it delivers. Typically, interactions with the FAA include:

- Applying for and obtaining experimental airworthiness certificates during the concept exploration and design development phase.

- Notifying the FAA at least six months before delivering the first aircraft of a new model to schedule a first make/model audit.
- Granting the FAA access to facilities and data needed for this audit.
- Providing FAA auditors evidence of compliance to applicable, FAA-accepted, industry consensus standards.
- Submitting applications to the FAA for special airworthiness certificates for each new aircraft produced.

In addition, the FAA may request information from a manufacturer if it determines that an Airworthiness Directive (AD) is necessary to mandate actions to correct an unsafe condition.

WHICH CONSENSUS STANDARDS ARE LSA REQUIRED TO MEET?

Light-sport category aircraft (LSA) must comply with applicable consensus standards specifically accepted by the FAA for certification of LSA. Stating compliance with other standards would not meet 14 CFR 21.190.

Under the MOSAIC final rule, changes to certification regulations for LSA take effect on July 24, 2026. These changes require a whole new set of consensus standards for compliance with design, production, and airworthiness requirements in 14 CFR part 22 for new LSA and new LSA kits delivered on or after this date.

While any consensus standards body can develop these consensus standards, currently only the ASTM Committee on Light-Sport Aircraft (F37 Committee) is doing so. The F37 Committee is creating functional standards that may apply to various classes of LSA along with integration standards that specify the applicable functional standards for each class of LSA. Once the FAA has completed its final review and accepted these new standards, it will notify the industry through the Federal Register.

Consensus standards accepted by the FAA before July 24, 2026, will remain valid for:

- Assessing compliance of alterations and repairs of LSA delivered before this date.
- Issuance of experimental airworthiness certificates for kit-built LSA with a manufacturer's statement of compliance issued before this date.

HOW DO I PARTICIPATE IN THE DEVELOPMENT OR REVISION OF LSA CONSENSUS STANDARDS?

While any consensus standards body can develop consensus standards for acceptance by the FAA for certification of light-sport category aircraft (LSA), currently only the ASTM Committee on Light-Sport Aircraft (F37 Committee) is doing so. The FAA encourages manufacturers and industry associations to work with the F37 Committee to develop and maintain these consensus standards.

WHERE CAN I LEARN MORE ABOUT CONSENSUS STANDARDS AND CONSENSUS STANDARDS BODIES?

Office of Management and Budget (OMB) Circular Number A-119: *Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities*, provides federal policies on this topic.

WHAT ARE THE NEW TRAINING REQUIREMENTS FOR MANUFACTURER'S STAFF UNDER PARTS 21 AND 22?

Starting July 24, 2026, manufacturers of light-sport category aircraft (LSA) must meet two new training requirements. First, under 14 CFR 22.190, LSA must be found compliant with applicable FAA-accepted consensus standards by individuals trained in assessing such compliance. This applies to each manufacturer's staff who has responsibility for determining compliance.

Second, under 14 CFR 21.190(d)(1), a person who signs a manufacturer's statement of compliance (SOC) must be trained and certified on the requirements for issuing that statement.

Compliance with these training requirements helps ensure that each LSA complies with all requirements and that only qualified individuals make and attest to those findings of compliance. The consensus standard for quality assurance systems will specify means of compliance for both training requirements.

DO RULES IN 14 CFR PART 5 FOR SAFETY MANAGEMENT SYSTEMS (SMS) APPLY TO MANUFACTURERS OF LSA?

No, part 5 SMS requirements do not apply to manufacturers of light-sport category aircraft (LSA).

WHAT ARE BEST PRACTICES FOR LSA MANUFACTURERS TO ASSURE COMPLIANCE WITH REQUIREMENTS?

Key elements of compliance assurance for manufacturers of light-sport category aircraft (LSA) include:

- Compliance with training and certification requirements for manufacturer's staff.
- Thorough development and documentation of your quality assurance system.
- Documenting evidence of compliance with all applicable consensus standards.
- Rigorous internal audits to verify compliance.
- Voluntary compliance with the consensus standard for third-party audits.
- Coordinating with your local FAA office at least six months before delivering a new model aircraft to schedule a first make/model audit. See FAA Order 8130.36, *Special Light-Sport Audit Program*.

DO ANY REQUIRMENTS MERIT EXTRA ATTENTION BY LSA MANUFACTURERS?

Although manufacturers are responsible for finding and stating compliance with all applicable FAA-accepted consensus standards for certification of light-sport category aircraft (LSA), FAA recommends that manufacturers give additional attention to compliance with consensus standards concerning the following:

- Vapor lock, the topic of an NTSB safety recommendation
- Occupant safety
- Quality assurance systems for new training requirements and internal audits
- Continued operational safety (COS) system
- Fire protection
- Flutter/aeroelasticity

HOW IS CERTIFICATION OF FOREIGN MANUFACTURED LSA DIFFERENT THAN LSA MANUFACTURED IN THE UNITED STATES?

First, regardless of the class of light-sport category aircraft (LSA), foreign-manufactured LSA must be produced in a country that has a bilateral airworthiness agreement with the United States, which includes acceptance of *airplanes* from that country. Such an agreement indicates that the FAA has determined the country has a regulatory system for the design, production, and certification of complex aeronautical products.

Second, the LSA must qualify for an airworthiness certificate, flight authorization, or similar certification in its country of manufacture.

Currently, no U.S. bilateral agreement includes specific procedures for importing or exporting LSA. That's why the FAA refers to the shipment of LSA rather than import/export, as these shipments do not require special import/export procedures or documentation, such as an export certificate of airworthiness. Like LSA produced in the U.S., foreign-manufactured LSA must comply with the requirements of 14 CFR 21.190 and 14 CFR part 22, including a manufacturer's statement of compliance with each application for issuance of an airworthiness certificate.

Typically, a foreign-manufactured aircraft goes through production flight testing at the manufacturer's facility. Following the manufacturer's instructions, the aircraft is then partially disassembled, crated, shipped to the United States, and rebuilt. Once rebuilt, it completes a check flight under a special flight permit (SFP) in accordance with 14 CFR 91.407. After successfully completing these steps, an application for airworthiness certification under 14 CFR 21.190 can be submitted to the FAA.

AS A DISTRIBUTOR OF LSA MANUFACTURED OUTSIDE THE UNITED STATES, WHAT MUST I DO TO MEET ELIGIBILITY REQUIREMENTS FOR A SPECIAL AIRWORTHINESS CERTIFICATE UNDER 14 CFR 21.190?

As a distributor of light-sport category aircraft (LSA) manufactured outside the United States, do the following to ensure an aircraft remains eligible for a special airworthiness certificate under 14 CFR 21.190:

- Obtain authorization and complete training from the LSA manufacturer for this activity.
- Verify that the aircraft was manufactured in a country with which the United States has a bilateral agreement that includes provisions for the acceptance of airplanes.
- Confirm that the aircraft is eligible for a flight authorization in its country of manufacture.
- Rebuild the aircraft according to the manufacturer's instructions.

- Following the rebuild, perform a check flight of the aircraft per 14 CFR 91.407 and manufacturer's procedures. Obtain from the FAA a special flight permit (SFP) for the check flight.
- Provide your customer with all documents required under 14 CFR 21.190(c), including the signed statement of compliance that accompanied the aircraft from the manufacturer.

You or your customer may apply for a special airworthiness certificate under 14 CFR 21.190.

THE STATEMENT OF COMPLIANCE FOR MY LSA KIT WAS SIGNED BEFORE JULY 24, 2026, BUT I WILL COMPLETE ASSEMBLY OF MY AIRCRAFT AFTER THAT DATE. WHICH CONSENSUS STANDARDS APPLY TO THE ISSUANCE OF AN EXPERIMENTAL AIRWORTHINESS CERTIFICATE FOR THIS AIRCRAFT?

The consensus standards in place on the date of issuance of the manufacturer's statement of compliance for the kit apply to that statement of compliance for issuance of the experimental airworthiness certificate. You may apply for an experimental airworthiness certificate under 14 CFR 21.191(k).

CAN I RECERTIFY MY NORMAL CATEGORY AIRCRAFT IN THE LIGHT-SPORT CATEGORY?

No, aircraft that previously held a standard category airworthiness certificate are not eligible for a light-sport category airworthiness certificate. See 14 CFR 21.190(b)(2).

CAN I ALTER MY LEGACY LSA OR EXPERIMENTAL LSA TO MEET MOSAIC LIMITS?

Light-sport category aircraft (LSA) holding airworthiness certificates issued before July 24, 2026 (legacy LSA), were designed, produced, and certified based on consensus standards that aligned with the definition of light-sport aircraft in 14 CFR part 1. Per 14 CFR 21.181, special airworthiness certificates for legacy LSA remain valid only if the aircraft continues to meet the light-sport aircraft definition (before July 24, 2026) or the elements of that definition included within 14 CFR 21.181 (starting on July 24, 2026). Therefore, altering your legacy LSA to exceed its original limits—such as weight, seating capacity, or speed—is more than a mere alteration. Such alterations will:

- Change the attributes of the aircraft beyond the scope of the original consensus standards.
- Render your airworthiness certificate ineffective.

MOSAIC was not intended to enable such alterations. To allow legacy aircraft to exceed the original light-sport aircraft definition and benefit from MOSAIC limits, you must comply with MOSAIC requirements. This involves obtaining a new statement of compliance (SOC) from the aircraft manufacturer for the altered aircraft based on the new consensus standards effective July 24, 2026, and applying for a new special airworthiness certificate under 14 CFR 21.190. Issuing a new SOC for legacy aircraft poses challenges for manufacturers, as it would necessitate compliance with new consensus standards for 14 CFR part 22 for aircraft originally designed and manufactured before the existence of part 22. While theoretically possible, this process may be

impractical or expensive for legacy aircraft. The FAA recommends contacting your aircraft manufacturer to assess the feasibility of such alterations for your specific aircraft.

For legacy experimental LSA, there are no regulatory prohibitions against such alterations. However, to reduce risks, the FAA advises against making such alterations without the manufacturer's approval. Alterations made without this approval could lead to more restrictive operating limitations to address increased risks to others.