

UK MIP Webinar

November 15, 2022

(Audience questions)

- **Is the IPA and TIP the same here?**

TIP is only EASA IPA is United Kingdom.

- **Will this become a tri-release?**

No plans to do so between the 3 authorities (FAA, UK CAA, EASA)

- **What is the Objective Evidence to show "Need" for a UK 145 Certificate?**

Evidence of Need. The applicant must submit a written statement demonstrating the CAA certificate and/or rating is necessary for maintaining or altering aeronautical products registered or designed in the UK or parts fitted thereon. The written statement may be in the form of a letter of intent (LOI), a work order, or a contract with details of the relevant customer.

UK MAG, Section B, paragraph 2.2.1.

- **Is CSOP being used for these new certs and is there a waiting period for these new certifications?**

No CSOP process to obtain a UK Part 145 certificate in the U.S. is not applicable.

Applicants in the UK seek an FAA Part 145 certificate will be entered into SAS CSOP only to generate the certification project. There should be no waiting period due to the UK CAA is conducting the majority of the certification support. UK MAG, Section C, paragraph 6.2.

- **What was the date that was just given for the MAG release?**

January 01, 2023 is the effective date.

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- **The EASA approvals being accepted for the two year grace period include those issued under the US/EU MAG as well as any facilities that got directly approved by EASA (i.e., not under the bilateral), right?**

No, the UK will no longer accept directly approved EASA facilities not under the bilateral after 12/31/22, or sooner. See ORSA NO 1516 issued by the UK CAA.

The CAA issued an exemption to the Part 145 rules in Nov 2021, ORS4 NO. 1516, attached. This exemption applies to US based EASA approved organizations not operating the US/UK bilateral. So in this case an EASA Form 1 would have been acceptable up to April 2022, and only after that if they applied for a UK 145 would it remain acceptable to 31st Dec 22. There is no extra privilege for US based organizations unless they are operating under the US/UK agreement.

- **How about corrections to the 8130-3? If the article was release prior to December 31, 2024, but the correction happens after?**

Yes, just ensure you document the original return to service date on the corrected 8130-3 to reflect tractability that the article met the deadline 12/31/2024.

UK MAG, Section B, paragraph 1.4.4.

- **Would we need to generate a separate manual for this agreement, like in our company we have a separate "EASA supplement?"**

Yes, UK compliant supplement developed for UK 145.

UK MAG, Section B, paragraph 2.2.2.

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- **Will a National Custom Data Collection Tool be developed for SAS to facilitate the UK certification?**

The National/Divisional Custom-Data Collection Tool (N/D C-DCT) “PGF-145 Certification/Renewal/Amendment with UK MIP Agreement” must be added to the configuration change.

For PG-145H Initial certification, Peer Group H Initial Certification DCT (FRS H Template DCT).

For PG-145H Renewal-The-C-DCT “Renewal Peer Group H”.

- **Will there be a Notice coming out that contains the interim guidance for this UK certification process?**

Yes, INFO 22004 issued 11/15/22.

- **Any tips for the special requirements for US Based companies?**

The Quality Assurance System must demonstrate the UK special conditions are in compliance with the procedural and compliance audits. Documentation must be identified where the UK is separate from EASA. The audit may be combine, but must reflect that the UK and EASA Special Conditions were audited. Ensure procedural and product audits include both authorities requirements, example-such as EASA issued AD’s and UK CAA issued AD’s.

- **Will SAS have UK MIP DCTs added or will the current EASA DCTs suffice?**

The CAA MIP audit report (see section B appendix 3 of the MAG) contains all the necessary questions that the FAA inspector must document and upload into the custom DCT to demonstrate compliance with the UK special conditions. At this time, SAS will not have a \$,0 DCT specific for the UK, so it is imperative to complete the CAA MIP report and upload it into the C-DCT in the common data field.

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- **Per the current EASA Mag, para 10.11.1.1 requires new components from a U.S. PAH consumed in a repair to be documented on an FAA Form 8130-3 as a new part. This has created a lot of issues for U.S. based repair stations. How is this handled under the UK MAG?**

Under the UK IPA it requires an FAA 8130-3 for new parts to be installed on a UK registered aircraft.

- **What are the new special conditions?**

Similar to EASA. See section B appendix 4 of the MAG.

- **Will this require a separate capability list, like the CAAC, or will this recognize the FAA Capability list, similar to the EASA supplement?**

They recognize the FAA capability list similar to the EASA supplement.

- **Will US Part 145 Repair Station be able to use its D100 Work Away for UK Registered aircraft similar to EASA MAG requirements?**

Yes, only to perform non-routine maintenance.

Section B Appendix 1 paragraph 19.

- **In the case of USA located UK facilities or UK FAA 145 Facilities will the IPA address Major Repairs by FAA DER's and/or RS-DER repairs for UK fitment**

Yes the IPA contains major repair/alteration data that is recognized between to both FAA and UK

- **Would a PO or RO from a UK customer satisfy a need?**

Yes, section B paragraph 2.2.1

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- **After all is completed, can or cannot issue one 8130-3 with FAA, EASA, and UK CAA release.**

No triple release but they can issue a separate FAA/EASA and FAA/CAA for that component.
Section B Appendix 1 Paragraph 10

- **Is this 8130-3 dual release replacing 8130-9 for major alternation on N registered aircraft maintained in UK?**

No

- **Have all FSDO's been briefed on what their role will be for this?**

FAA webinar to inspectors conducted. Also available FAA course 27100335 in eLMS

- **Can we maintain our current Air Carriers that fall under UK CAA after Dec 31, 2022 while we are completing the UK CAA certification?**

Yes. MAG reference: Section A; Paragraph 5.2.2

Until December 31, 2024, the CAA may rely on the EASA Supplement based on Annex 2 of the U.S-EU Agreement for U.S.-based AMO's desiring to perform work on civil aeronautical products under the regulatory control of the CAA. The CAA issued Decision No. 3, dated December 22, 2022, to address this issue and proper logbook entries.

- **145 RS with an accessory rating has Distributor as a customer. Not knowing where the components ends up. Is a US distributor requesting the dual release a legitimate need for the certificate?**

Applicant should provide a written statement of the contract with details of the customer request.

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- **So if a US Repair Station (RS) w/EASA 145 certifies appliances that can and do get installed on UK aircraft will now need a UK 145 certificate for this to continue?**

Yes after December 31, 2024 they will need to hold a UK -145 certificate for this to continue.

- **Any reference as to pricing for this additional certification?**

Section B, paragraph 2.2.4 – The applicant will comply with the CAA fees and charges regulation found at Official Record Series 5 – CAA Scheme of Charges (Airworthiness Noise Certification and Aircraft and Aircraft Engine Emissions). The web site is:

<https://publicapps.caa.co.uk/modalapplication.aspx?catid=1&pagetype=65&appid=11&mode=list&type=sercat&id=10>

- **Being a Parent Repair Station with EASA certification and looking to bring a Satellite facility on board beginning first quarter next year, would it be best to align both facilities under the new requirement or best wait until the 120 days prior to renewal for both facilities?**

Aligning both will keep the expiration date and fee schedule manageable.

- **Is there a reason why a "triple release" won't be allowed in one 8130-3 form, to save paper?**

There is a bilateral agreement btw two counties and EASA did not want to recognize the UK Part 145 certificate after the UK withdrew from the EU,

- **So, like dual release 8130's that have specific verbiage about meeting EASA requirements, new verbiage will need to be added for this agreement?**

Yes, Section B; Appendix 1; Paragraph 10

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- **So for component level, chances are a dual release for EASA and UK release for each component if they don't know where the part is going**

Yes in most cases they will need an EASA and UK release

- **Currently EASA does not allow scheduled maintenance out of the US. Will CAA allow scheduled maintenance out of US?**

MAG reference: Section B; Appendix 1; Paragraph 18 (Line MX) and 19 (Work away)

For work away it is only urgent defect rectification and non-routine maintenance.

Line Maintenance may be authorized at locations that are currently holding FAA line maintenance authorization (D-107 locations)

- **Right now we have 8130-21H for guidance on completing 8130's. Will a revision be made to this to include CAA release?**

NO, all guidance is in the MAG concerning how to perform an approval for a return to service.

- **Will the UK CAA have a separate agreement with EASA, if so what prevents the USA EASA/145 sending 8130-3 through that EU EASA 145?**

No, not at this time. After 12/31/2024 an EASA/FAA dual release from the US will not be acceptable to the UK.

- **Would there be a link to know what aircrafts are UK registered?**

Contact UK CAA for a list.

- **Can an aircraft manufacturer require certification to maintain a certified repair station service facility as proof of need?**

Yes Section B; Paragraph 2.2

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- **My EASA expires on 02/01/2023 do i have to do the UK application now?**

The EASA certificate is recognized till December 31, 2024. To align expiration dates make application 120 days prior to December 31, 2024. You may submit application any time after January 01, 2023.

- **Is Work away under D100 for scheduled maintenance outside the repair station domicile country being considered for the MAG?**

MAG reference: Section B; Appendix 1; Paragraph 19 (Work away)

Only for non-routine maintenance.

- **We have just submitted our EASA renewal that is due in 2023. Since you were speaking about doing both at near the same times when will we be able to apply and receive our UK CAA Certification.**

Any time after January 01, 2023 and you may apply for UK-145 renewal early to align the EASA expiration date with the UK -145 expiration date.

- **Are CAA AD's going to be listed on FAA and EASA web sites?**

No, go to UK CAA website for a listing.

- **Is it the customer's responsibility to document/notify the US repair station facility they need a UK 145 Certification upon returning back to them.**

Yes

- **Can we not put in Block 12 of the 8130-3 the CAA and EASA with extra line stating any AD/SB if specified it is CAA, EASA or FAA so that the 1 Form can be issued?**

Cannot perform a CAA and EASA release on the same 8130-3.

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- **Besides the YouTube link, will the material cover in this presentation will be available in PDF format for download?**

We are looking into posting it into the FAA Repair Station website.

- **Can larger 145 CRS with multiple units be allowed to apply for a "Group" certification or only individually?**

Each 145 certificate will need an individual UK 145 certificate.

- **A little confused. If i am repairing a part for the UK, i need an EASA dual release and a separate CAA dual release?**

No, A UK-145 release is sufficient for a UK registered aircraft or articles for fitment onto UK registered aircraft.

- **Will Subcontractors also need to have a CAA Cert?**

For lower assembly parts being installed on a higher assembly receiving a UK Part 145 release the lower assembly parts must have a UK 145 release prior to installation into a high assembly.

- **Will a PO requesting CAA certification from a UK based company meet the "need" requirement?**

Yes, Section B; Paragraph 2.2

- **How do we resolve differences in AD resolution in the event they differ? Is there a priority. Between FAA, EASA or UK CAA. Or the initial issuing org.**

It depends what state of registry the component is being installed on. The state of registry may require specific method of compliance.

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- **Is the UK number different than EASA and is the UK issuing a certificate like EASA**

Yes, the numbers will be different and the certificate for UK Part 145 will be CAA Form 3.

- **Can the UK 8130-3 be on the back of the EASA 8130-3?**

Yes

- **Are there any plans to revise the 8130-3 to address triple releases?**

No

- **Will US Part 145 Repair Station be required to issue multiple dual release 8130's (FAA/EASA as well as FAA/CAA) when returning an article to service where the end user may operate within the EU and UK? Or will it be the responsibility of the EASA/CAA end user/operator to determine which regulatory body the article will be used under.**

The customer should identify the type of release that is required.

- **Parts processed and tagged with an 8130-3 after 31/DEC/2024 will need to have a FAA/CAA dual release to be accepted for use in a UK registered aircraft?**

Yes. MAG reference: Section A 1.4

- **Typically, our work orders only issue 1 computer generated 8130-3 tag per unit ... will an externally generated 8130-3 tag be acceptable to the UK if needed.**

Yes

- **Is there any plan to have a bilateral between the EU and the UK to alleviate separate manuals and certification requirements?**

No, EASA does not recognize maintenance performed in the United Kingdom.

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- **Will UK CAA jurisdiction cover UK territories as well?**

No, only the United Kingdom. Only England, Wales, Scotland and Northern Ireland.

- **Did I understand Neil Williams say there is no present MAG/MIP agreement with EASA & UK?**

Yes, correct.

- **When will SAS be updated to include appropriate questions for issuance/renewal of the new UK certificate?**

Prior to January 01, 2023, AFS-900 will issue a National Custom DCT for the United Kingdom.

“PG F-145 Certification/Renewal/Amendment with UK MIP Agreement.”

- **If we have more than one location working to the same UK-CAA Supplement in different states, will each facility have to get certified or can we obtain one UK-CAA certificate?**

Each FAA certificate will require a UK Part 145 certificate. All authorized locations under a single FAA certificate maybe under a single UK Part 145 certificate.

- **Will a Safety Management System be required as part of the UK Part 145 for US based repair stations?**

Not currently but maybe required in the future.

- **When will the newly signed MIP, and related docs (MAG, etc.), be posted to the FAA website?**

MIP is on the website <https://drs.faa.gov/search> (Search UK MIP)

MAG will be published at the same site by January 01, 2023.

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- **Will the CAA recognize current EASA validations of major repairs (obtained prior to UK Brexit) or will these EASA validations require a CAA validation?**

Major repairs under an EASA release within the US will not be acceptable by the UK CAA after December 31, 2024.

- **Will a 145 repair station require an additional accountable manager for the CAA? Or can the current FAA or EASA accountable manager also perform that task?**

The current FAA account manager can fulfill the role under the UK Part 145 certificate.

- **Will the FAA/CAA MAG align with new replacement part ARC requirements of the FAA/EASA MAG?**

Under the trade agreement between the UK and the EU newly manufactured parts under Part 21 are recognized between each country.

- **Currently we a Part 145 Line Maintenance Repair Station only use EASA certificated vendors/contractors on EASA registered aircraft for services we have to contract out, will this be the same for UK CAA Registered aircraft whereas the vendor/ contractor must be UK CAA. Example our Repair Station contracts out NDT and our vendor must be EASA certificated.**

Yes, they would need to hold a UK Part 145 approval unless the original repair station is providing an approval for return to service of the work performed by the contractor.

MAG reference: Section B; Appendix 1; Paragraph 10

- **What about parts that sit on shelf for several years. Will they need separate 8130 with CAA approval after January 1, 2024? If so can a cert be issued or does the part require reinsertion?**

As long as the EASA approval for return to service is dated prior to December 31, 2024 the part would still be eligible.

MAG reference: Section A, Paragraph 5.2.2

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- **For Repair Stations that are rated for components that provide parts for asset pools that may be used by a UK operator, does that constitute sufficient "need"?**

Yes. Section B; Paragraph 2.2.1

- **Will new Parts with an FAA 8130-3 or EASA dual release be acceptable to install on a UK aircraft?**

Yes, see UK IPA. A new part would not have a dual release. The UK will issue a CAA Form 1 for new parts. Under the Trade Agreement between the UK and EU, part 21 is recognized, no further approval is required.

- **Will the Ops Specs A007-1 have to be changed to incorporate CAA Designated Personnel?**

The existing A007 OpSpec listing of personnel is sufficient for the UK Part 145 certificate.

- **Why is the UK deviating away from EASA?**

EASA would not recognize the UK civil aviation authority after the UK withdrew from the European Union. Politics is a major contributor.

- **In relation to your NDT sub-contractor please clarify because it sounded like that response was different than an earlier one. Does all sub-contract work need to go only to another CAA certificated facility? Such as a plating process?**

Yes, unless the originating repair station is providing approval for return to service of the subcontracted work prior to installation of the article.

Section B; Appendix 1, Paragraph 16

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- **Will the UK CAA maintain a web site listing US MROs application and certification status, similar to the list that was maintained during the EASA transition?**

Yes

- **What if the UK aircraft is located in USA and gets fitment in USA?**

Any maintenance performed in the United States on a UK registered aircraft after 12/31/24 must be performed by the holder of a UK Part 145 certificate.

- **What about strictly new parts PMA parts?**

The use of PMA parts must be documented on the 8130-3. The US and UK recognize each Part 21 systems under the IPA.

- **The EASA has added a requirement that New Components, including Piece Parts (those going into Instruments or other articles), must have a single US 8130-3 from the PAH or direct ship authority, or the part can't go into a Dual Release article. This is not a FAA requirement, just EASA. Will this requirement be in the CAA MAG?**

Yes it is a requirement under the IPA.

- **How will a License A&P 337 tag is issued?**

The A&P will not be recognized for returned to service on a UK registered aircraft. Any maintenance performed on a UK aircraft must be accomplished under a UK Part 145 certificate.

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- **Regarding training requirements, currently with EASA, EASA customers may accept US aircraft type training requirements, will UK CAA be the same or must all technicians be Level III, B1/B2/ Part 66 trained?**

The training performed under the current 14CFR Part 145 training program is acceptable to the UK CAA, with the exception of additional Human Factors training. Part 66 is not required in the US.

MAG Reference: Section b; Appendix 1; Paragraph 17

- **Will hardware being used in the repair and maintenance of components released to a UK part 145 such as Bolts, Vanes, etc., be required to be manufactured and certified in accordance to a UK spec to be installed in a UK part? And is there a drop dead consideration for components manufactured prior to the drop dead date?**

Standard parts are recognized by the UK CAA under the IPA.

- **Will return to service authority need to be tracked separately from the FAA Return to Service, EASA authorization, JCAB, or CAAC?**

Individuals authorized for return to service under a UK Part 145 must demonstrate they have sufficient training and knowledge of the UK MAG and MIP special conditions. Indicating their qualifications for EASA, UK should be identified in their records or on the roster.

- **Can a FAA 145 repair station use a CAA certificate from a UK PMA or do they also need an EASA release?**

The UK and the EU recognized each other's manufacturing Part 21 systems under their trade agreement. A new part with an EASA Form 1 can be used on UK registered aircraft.

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- **Will US Repair Station owned engines/accessories leased to operators in the EU be required to have both EASA and CAA 8130's, or is it the customers responsibility to determine what regulatory bodies that the article be operated in?**

It will be the customer's responsibility to ensure the proper airworthiness requirements for the state of registry.

- **How will RTS be handled by 135 operators?**

14 CFR Part 135 operators may not conduct maintenance on any UK registered aircraft or component for fitment onto such aircraft.

- **Do the major acft manufactures who now request a dual release, know that they'll start having to request a UK CAA release?**

If a manufacturer is conducting maintenance on a UK registered aircraft, they need to have UK Part 145 certificate. The FAA issued an INFO alerting all operators on the requirements for UK 145 certificate.

- **Either or UK or USA 135 have maintenance release authority and many do not carry 145 operations certs so are they covered by MIP/MAG**

14 CFR Part 135 operators may not conduct maintenance on any UK registered aircraft or component for fitment onto such aircraft.

- **We support several large customers overseas that support global customers via power by the hour programs, we will need to provide a repaired component with both an FAA/EASA and an FAA/CAA 8130 tag to satisfy the UK customer needs?**

Maintenance performed on UK register aircraft must be released under a UK Part 145 certificate.

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- **Do all my suppliers and vendors need to be UK and EASA approved?**

On repaired components releases after 12/31/24 from US based repair stations must be released under a UK Part 145 certificate. EASA does not accept a UK release on EU aircraft.

Section A; Paragraph 1.4.3

- **In some cases a USA 145 is repairing parts for a Canadian MRO and we have no idea that it's for UK fitment, what's the course of action here?**

On repaired components releases after 12/31/24 from US based repair stations must be released under a UK Part 145 certificate. The Canadian MRO should identify the type of release that is required.

Section A; Paragraph 1.4.3

- **Will the new UK MAG/IPA allow Form 337 use?**

14 CFR Part 145 Repair Station may issue form 337. They should develop procedures for its use and ask the UK customer if they require specific UK forms to document the major repair/alteration for UK registered aircraft. The UK Part 145 certificate can be used in this case to reflect the major repair/alteration was performed under a UK Part 15.

See MAG Section B, Appendix 1, paragraph 8.0 on acceptance of data.