

**United Kingdom  
Civil Aviation Authority  
Official Record Series 9**



**CAA Determination of same independent level of checking of compliance through an equivalent system of approvals of organisations under Article 4 (1A) UK Reg (EU) No. 1321/2014 (UK Continuing Airworthiness) Regulation**

**CAA Decision pursuant to Article 76 UK Regulation (EU) 2018/1139 (“UK Basic Regulation”) to adopt AMC to UK Reg (EU) No.1321/2014 (UK Continuing Airworthiness) Regulation**

**CAA DECISION No. 41**

**Publication date: 18 December 2024**

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**General Aviation, Part-ML: Decision enabling approved maintenance organisations to use maintained components which have been released by EASA approved maintenance organisations on an EASA Form 1**

**Background**

On 31<sup>st</sup> December 2024, UK CAA ORS9 Decision 24 and associated date referenced to within AMC1 ML.A.501(a)(ii) and AMC1 145.A.42(a)(i) will expire. ORS9 Decision 24 and the associated amendments enables the acceptance of an EASA Form 1 as equivalent to a UK CAA Form 1 in certain limited circumstances for aircraft falling within the scope of Part-ML.

The UK CAA recognises that there continues to be a shortage of CAA approved organisations providing maintained components for use that are of a highly specialised in nature can only be maintained by organisations based within EASA Member States. As a result of the above, there is a need for the UK CAA to continue measures permitting acceptance of EASA Form 1, Authorised Release Certificates in certain limited circumstances for a further period.

The CAA has determined that the EASA system, in certain specified, limited circumstances, includes the same independent level of checking compliance as provided by the UK system under the UK Continuing Airworthiness Regulation. Pursuant to Article 4(1A) of UK Reg (EU) No. 1321/2014, the CAA has discretion to consider whether organisations in the EASA system have demonstrated capability such that they can maintain components fitted on UK registered aircraft notwithstanding the fact that they do not hold a UK approval.

The CAA has therefore decided that it will use its powers to allow for the continued supply of some maintained components to the extent set out in this document. To achieve this, the CAA will, by this document, take 2 steps (both made by this document).

First, the CAA will exercise its power under Article 4(1A) of UK Reg (EU) No. 1321/2014 to determine that EASA has an equivalent system of approvals as a result of which the CAA has

the discretion to permit the installation of aircraft components maintained by organisations (to the extent determined by the CAA) located in EASA Member States.

Secondly, the CAA will exercise that discretion, and so permit, by adopting a new expiry date within existing AMC adopted at the same time as the original ORS9 Decision 24 was made. This extended decision specifies that some of the aforementioned components are acceptable for the purpose of meeting the terms of the requisite regulation (and thereby to clarify that operators and maintenance organisations may fit such components released on an EASA Form 1 onto UK-registered aircraft).

- The CAA has decided to limit this decision to components of aircraft which fall within the scope of Part-ML because this provides the most acceptable and proportionate dividing line within the CAA's continuing airworthiness regulatory architecture for operators, maintenance organisations, and our safety assurance system; and
- Additionally, the CAA has decided to limit this action only to components
  - released by an EASA approved organisation (located in an EASA Member State) that is the Original Equipment Manufacturer (OEM) (or its authorised agent) of the relevant component; and
  - not available from
    - a CAA approved maintenance organisation (based either inside or outside of the UK);
    - a maintenance organisation approved or accepted under the terms of a Bilateral Aviation Safety Agreement between the United Kingdom and another state; or
    - a maintenance organisation approved or accepted under the terms of a Working Arrangement established by the CAA with another national aviation authority.

Additionally, it should be noted that the CAA will clarify in the AMC that components are only acceptable for the purpose of meeting the terms of the requisite regulation where the EASA approved organisation releasing components is located within an EASA Member State.

For the avoidance of doubt GM for GM1 ML.A.501(a)(ii) and for GM1 145.A.42(a)(i) adopted by ORS9 Decision 24 (that guides users that where a component released on an EASA Form 1 cannot be fitted to a UK registered aircraft they can obtain a component from either a UK Part-CAO organisation or a UK Part-145 which has subsequently been issued with a CAA Form 1 through the process which applies to components maintained by unapproved organisations set out in AMC1 to Part-CAO.A.070(a) paragraph (2.8) or AMC 2 to Part-145.A.50(d) paragraph (2.8) respectively) remains in force.

The CAA will keep both the need and the basis for this determination and these decisions under review and will consider this at least annually. Relevant considerations include whether organisations seeking to obtain a UK approval emerge and the extent to which the UK and

EASA regulatory systems diverge. It may be revoked prior to its expiry date. The CAA will endeavour to give as much notice as practical before such a revocation.

**Decisions:**

1. The CAA, under Article 4 (1A) of UK Reg (EU) No. 1321/2014, has determined:
  - a. EASA Member States have established a system which provides the same independent level of checking compliance through an equivalent system of approvals of organisations for Part-ML aircraft and therefore has an equivalent system of approvals for maintained components as is required in the United Kingdom;
  - b. This determination is limited to organisations which maintain components for aircraft which fall within the scope of Part-ML; and
  - c. This determination is limited to Original Equipment Manufacturer (OEM) organisations or one of their appointed agents.
2. The CAA, pursuant to Article 76 of UK Reg (EU) 2018/1139, has decided to adopt the new AMC expiry date including a typographical correction for AMC1.ML.501(a)(ii) and AMC1 145.A.42(a)(i) set out in Schedule 1 below that clarifies a document *equivalent to a CAA Form 1* also includes an EASA Form 1 Authorised Release Certificate issued after 31 December 2022 for a Part-ML aircraft component maintained by an EASA approved organisation based in an EASA Member State, if that organisation is the OEM (or their appointed agent) of the component but only if the required components cannot be obtained from:
  - a) a CAA approved maintenance organisation (based either inside or outside of the UK);
  - b) a maintenance organisation approved or accepted under the terms of a Bilateral Aviation Safety Agreement between the United Kingdom and another state or;
  - c) a maintenance organisation approved or accepted under the terms of a Working Arrangement established by the CAA with another national aviation authority.
3. These decisions come into force on 1 January 2025.
4. These decisions will remain in force until 31 December 2029 unless otherwise revoked or amended by the CAA.
5. The impact of this decision on the UK market for aviation components will be kept under continuous review by the CAA, at least annually. This decision may be revoked at any time by the CAA for example in response to emerging market trends or changes to the regulatory landscape.

## Definitions

1. All references to '*Regulations*' are to the UK assimilated law bearing that title or number.
2. '*Maintained*' means Overhauled, Repaired, Inspected/Tested or Modified as defined in Appendix II to Annex I (Part-M) of UK Reg (EU) No. 1321/2014.
3. Part-ML applies to the following non-complex motor-powered aircraft not listed in the air operator certificate of an air carrier:
  - a) aeroplanes of 2 730 kg maximum take-off mass (MTOM) or less;
  - b) rotorcraft of 1 200 kg MTOM or less, certified for a maximum of up to 4 occupants;
  - c) other ELA2 aircraft (noncomplex motor-powered aeroplane, sailplane or powered sailplane with an MTOM less than 2 000kg).



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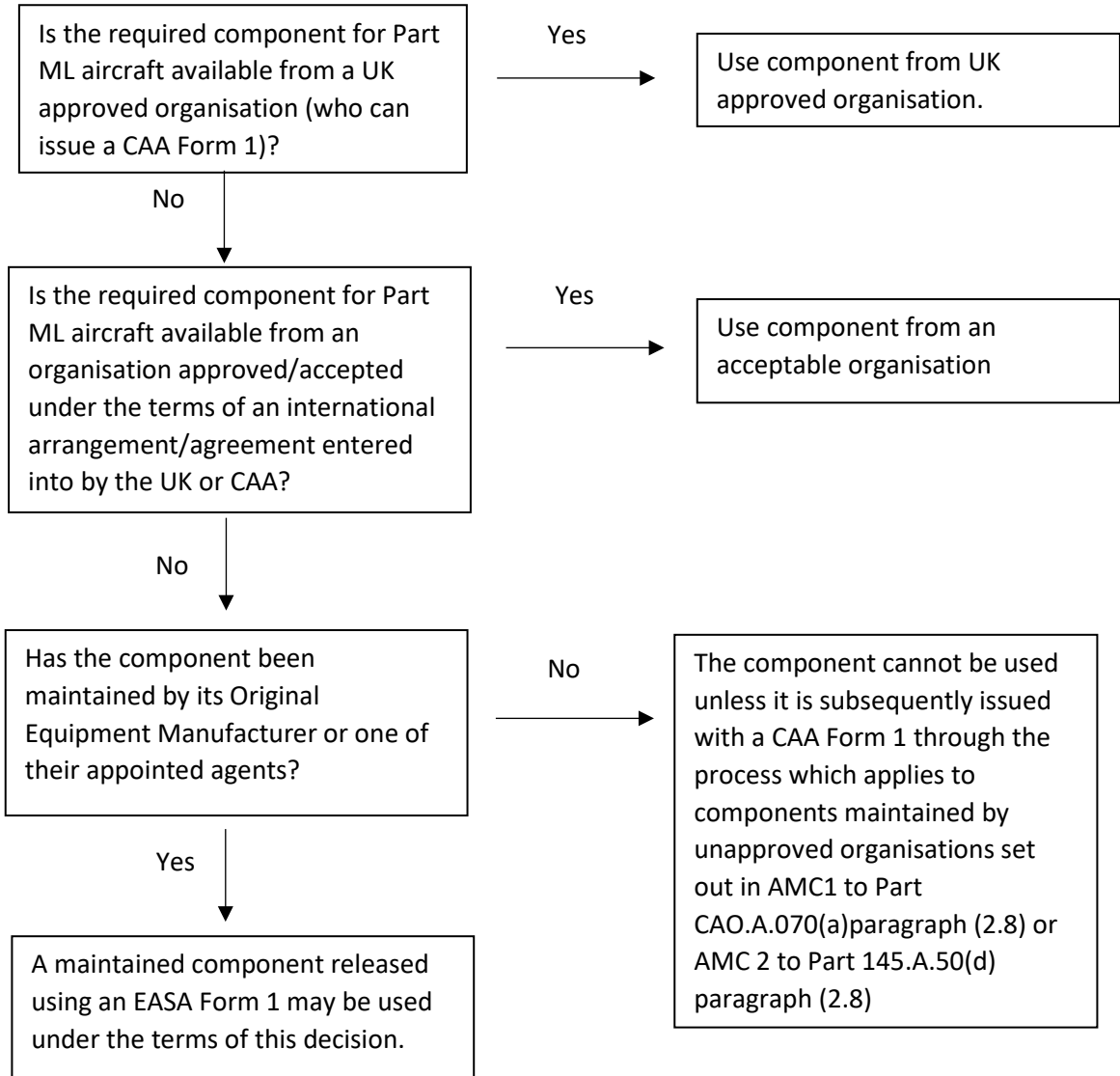
Date of Decision: 18 December 2024

Date of Decision Coming into force: 1 January 2025

## Explanatory note

1. The UK has in place a Trade and Cooperation Agreement with the EU which covers the design and production of new aviation components. This agreement includes the acceptance of **new** aircraft components produced by organisations based in the EU and is therefore not addressed in this decision. This determination only applies to used components that have been maintained, repaired or overhauled and subsequently released to service using an EASA Form 1 (for Part-ML aircraft). This decision also adopts revised AMC for AMC1.ML.501(a)(ii) and AMC1 145.A.42(a)(i) to clarify this additional means of compliance with the requirements of the relevant regulation.
2. A list of international arrangements and agreements, including those that cover aircraft and component maintenance is provided on the CAA's website here: [International Co-operation | Civil Aviation Authority \(caa.co.uk\)](#)

3. The following process should be followed when determining whether a component is acceptable under the provisions of this decision:



## Schedule 1 – Changes to associated AMC

Includes the Acceptable Means of Compliance (AMC) referenced to below:

### AMC1 ML.A.501(a)(ii) Classification and installation

#### CAA FORM 1 OR EQUIVALENT

A document equivalent to a CAA Form 1 is:

[...]

(k) (Until, and including, 31 December 2029) for ML aircraft, an EASA Form 1 issued by the component's Original Equipment Manufacturer, or one of its appointed agents located in an EASA member state, EXCEPT WHEN those components are available from a UK approval holder, or an organisation approved or accepted under the terms of a Bilateral Aviation Safety Agreement with the United Kingdom or a maintenance organisation approved or accepted under the terms of a Working Arrangement established by the CAA.

### AMC1 145.A.42(a)(i) Components

#### CAA FORM 1 OR EQUIVALENT

A document equivalent to a CAA Form 1 is:

[...]

(g) (Until, and including, 31 December 2029) for ML aircraft, an EASA Form 1 issued by the component's Original Equipment Manufacturer, or one of its appointed agents located in an EASA member state, EXCEPT WHEN those components are available from a UK approval holder, or an organisation approved or accepted under the terms of a Bilateral Aviation Safety Agreement with the United Kingdom or a maintenance organisation approved or accepted under the terms of a Working Arrangement established by the CAA.