

Aerospace maintenance organisations (Subpart F)

Information on Subpart F aerospace maintenance organisations

If no deal is concluded between the EU and the UK, organisations (Part-M Subpart F) maintaining aircraft might need to take action to maximise continuity and stability for the aviation sector. Actions required would depend on individual circumstances and are a matter for each business and individual to consider. This page sets what you need to consider to prepare for such an eventuality.

PART-M SUBPART F MAINTENANCE OF AIRCRAFT – UK APPROVED

Yes, as a UK-approved Part M Subpart F holder your approval would remain valid after the UK leaves the EU with the same scope of work as you have today. There is no need for a new certificate, as it was issued by the UK CAA (not EASA). The UK CAA would arrange for an updated certificate to be issued the next time you change your approval or when the normal two-yearly recommendation is made by the CAA to continue the approval. This would remove the references to EASA.

Yes, as a UK-approved Part M Subpart F holder, you would be able to continue to certify UK-registered aircraft as your approval would still be valid after the UK leaves the EU.

To continue to certify EU-registered aircraft you would also need to hold an EASA Part M Subpart F approval. Should there be a non-negotiated withdrawal, the European Commission has said that the UK would be considered a third country. EASA has said that it will accept third country applications from UK holders of Part M Subpart F approvals. Organisations will need to decide whether, in a non-negotiated withdrawal, they wish to retain both a national and an EASA approval. Further details regarding the [EASA application process \(https://www.easa.europa.eu/brexit\)](https://www.easa.europa.eu/brexit) can be found on this link.

A UK Part M Subpart F would be needed to continue to certify UK-registered aircraft.

Part M Subpart F does not have the same provisions as Part 145 to use non-EASA licences to support an approval issued in Third Countries. You are advised to contact EASA as soon as possible to discuss this.

Your organisation would need to apply for an EASA approval if it intends to maintain aircraft registered in the EASA member states. Other non-European states of registry may accept CAA-issued approvals.

You are advised to contact EASA or the State of Registry NAA as soon as possible to discuss the application process in this scenario.

Since October 2018, EASA has said that it will accept third country applications from UK holders of Part M Subpart F approvals. Organisations will need to decide whether, in a non-negotiated withdrawal, they wish to retain both a national and an EASA approval: <https://www.easa.europa.eu/brexit> (<https://www.easa.europa.eu/brexit>)

The CAA intends to continue to recognise current (and valid) EASA certificates for an initial period of up to two years, but no decision has been made about validity after this period.

This is a decision for the National Aviation Authority of the state of registry. Please contact the specific NAA directly as soon as possible.

No – once the UK formally leaves the EU, you would no longer be able to issue EASA Form 1 certificates. The UK would issue CAA Form 1 certificates independent of the EASA system.

The Form is to be completed in accordance with the existing Instructions and AMC/GM, with the exception that the Authority information in the header and the Form Reference itself (CAA Form 1 rather than EASA Form 1) is changed.

A word version of the new UK form is available here: [CAA Form 1](#)

A sample template is available here: [CAA Form 1](#). As can be seen, the technical information remains unchanged. The form is to be completed in accordance with the existing instructions and AMC/GM with the exception that the Authority information in the header and the Form Reference itself (CAA Form 1 rather than EASA Form 1) will change.

Yes, these components could continue to be fitted to a UK-registered aircraft, but only for a period of up to two years.

Yes, they could continue to certify under a UK approval. The UK-issued Part 66 licence would remain valid after the UK leaves the EU, and there is currently no need for re-issue of the licence.

Yes, they could continue to certify under the UK approval, but only for a period of up to two years. After that, the engineer would need to obtain a licence from the CAA. The CAA would provide an application process for EU licence holders to apply for a UK licence after the UK leaves the EU.

PART-M SUBPART F MAINTENANCE OF COMPONENTS & SPECIALISED SERVICES – UK APPROVED

Yes, as a UK-approved Part M Subpart F holder your approval would remain valid post-EU exit with the same scope of work as you have today. There would be no need for a new certificate as it was issued by the UK CAA, not EASA. The UK CAA will arrange for an updated certificate to be issued the next time you change

your approval or when the normal two-yearly recommendation is made by the CAA to continue the approval. This would remove the references to EASA.

No – once the UK formally leaves the EU, you would no longer be able to issue EASA-approved Form 1 certificates. The UK would issue Form 1 certificates independent of the EASA system.

A template of the new UK CAA Form 1 is available here: [CAA Form 1](#)

The European Union has adopted legislation (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.LI.2019.085.01.0011.01.ENG&toc=OJ:L:2019:085:TOC>) that, after exit day, would recognise Form 1s issued by UK organisations before exit day. Further details on EASA planning can be found here: [EASA Brexit](https://www.easa.europa.eu/brexit) (<https://www.easa.europa.eu/brexit>)

Yes, these components could continue to be fitted to a component released under a CAA Form 1 from the exit date onward for a period of up to two years.

PART-M SUBPART F MAINTENANCE OF AIRCRAFT BY ORGANISATIONS LOCATED OUTSIDE THE UK

Yes, the CAA is intending to continue to recognise non-UK EASA Part M Subpart F organisations for up to two years. To enable these organisations to release UK-registered aircraft during this period, an EASA Part M Subpart F approval will be recognised in UK legislation. There may be some minor changes to the certificate of release to service to recognise the UK legal basis for the release.

The CAA will be reviewing the situation after the UK leaves the EU.

Please note that UK operators may insist that their maintenance providers have a UK approval as part of the commercial arrangements. This is at the discretion of the operator. Should an organisation wish to apply for a UK approval, however, please review the [third country application page](https://www.caa.co.uk/Commercial-industry/Aircraft/Airworthiness/Organisation-and-maintenance-programme-approvals/Apply-for-a-third-country-airworthiness-approval/) (<https://www.caa.co.uk/Commercial-industry/Aircraft/Airworthiness/Organisation-and-maintenance-programme-approvals/Apply-for-a-third-country-airworthiness-approval/>) on the CAA website for further details.

PART-M SUBPART F MAINTENANCE OF COMPONENTS & SPECIALISED SERVICES BY ORGANISATIONS LOCATED OUTSIDE THE UK

Object reference not set to an instance of an object.

Yes, as the current EASA system allows for components removed from non-EU aircraft to be maintained and released with an EASA Form 1 providing the component conforms to EASA maintenance/design data.

AIRWORTHINESS DIRECTIVES

All EU regulations applicable at the point of UK exit would be retained in UK domestic legislation in a no-deal scenario, including Regulation (EU) No 1321/2014, Part M. This means owners, operators and Continuing Airworthiness Management Organisations (CAMOs) would continue to review and apply applicable Airworthiness Directives to their respective fleets based on requirements for the aircraft and its engines, propellers and equipment as set out in CAP 747 Mandatory Requirements for Airworthiness, Airworthiness Directives issued or adopted by EASA, plus any Airworthiness Directives notified by the State of Design.

You can view CAP 747 here: www.caa.co.uk/CAP747 (<https://www.caa.co.uk/CAP747>).

The CAA is aware that CAP 747 currently has some out-of-date references and is in the process of updating the document. Reference to superseded or amended regulations should be taken to mean the current version of the applicable regulation in force. The CAA will ensure any mandatory requirements for UK-registered aircraft are reflected within CAP 747 and also made available via the CAA website [Airworthiness Directive page](https://www.caa.co.uk/Commercial-industry/Aircraft/Airworthiness/Continuing-airworthiness/Airworthiness-Directives/) (<https://www.caa.co.uk/Commercial-industry/Aircraft/Airworthiness/Continuing-airworthiness/Airworthiness-Directives/>). For enquiries relating to ADs, please email ad.unit@caa.co.uk (<mailto:ad.unit@caa.co.uk>).