

## Comment response document for NPA 21-25

### Common Release Certificate

A total of 63 comments were received from 6 JAA-NAAs, 1 JAA Sub Certification Committee, 1 Central JAA Division, 1 European Association of Manufacturers, 1 European Association of Airlines, 10 European Production Organisations, 1 USA Manufacturer and 2 European Operators.

The following have replied that they agree with the proposed text:

Smiths Harlow Aerospace Ltd.  
CAA Malta  
British Airways  
Association of European Airlines

The following have replied that they had no comments:

CAA Denmark  
Euravia Engineering & Supply Co. Ltd.  
Go  
Wollaston Engineering Ltd.  
FOCA Switzerland

In the following table the received comments are sorted according to NPA 21-25 paragraph number, the comment is worded together with the originator, the response to the comment from the NPA 21-25 Working Group is worded and the resulting text for NPA 21-25 is given.

Note: *Italics* are used to show changes and new text

NPA Paragraph	Comment / Originator	Comment	Response	Resulting text
4.4	21 AECMA	Reword JAR 21.307(a) as follows: "Accompanied by an Authorised Release Certificate certifying conformity of the part or appliance with the approved design and condition for safe operation."	This comment is understood but the objective is to keep the mention of airworthiness in the rule. Explanation of airworthiness is given in new ACJ 21.307(a) The present wording will be retained.	<b>Modify JAR 21.307(a) as follows:</b>  (a) Accompanied by an <del>Airworthiness Release Document</del> <u>Authorised Release Certificate (JAA Form One)</u> , certifying <u>airworthiness</u>
2.2 & 4.5	40 EADS AIRBUS (G)	Explanation is asked for Term " condition for safe operation "	Throughout this NPA it is clarified that airworthiness means conformity with approved design data and condition for safe operation (consistent with FAA definition). Need for a definition is recognised for engines, propellers, parts and appliances. Preparation of a TGM will be considered, not to delay publication of this NPA  The responsibility for determining condition for safe operation as part of an airworthiness release is with the production organisation and the signing of the airworthiness release confirms that this has taken place.	<b>Modify JAR 21N307(b) as follows:</b>  (b) It is accompanied by an airworthiness release document certifying conformity of the part or appliance with the approved design <u>and condition for safe operation</u> , issued in accordance with the Arrangement set up under JAR 21N5; and  <b>Condition for safe operation definition was put on PSCC workplan</b>
ACJ 21.4	49	Introduce compliance to 21.4	The comment is completely	<b><u>ACJ 21.4</u></b>

	DGAC (F)	<p>in: 21.44 (instead of 21.45 21.118A 21.609 21.711 this co-operation requirement should be addressed in the responsibilities of all design approval holders</p>	<p>agreed, concerning JTSO and JPA it is noted that as the rule is currently written design and production are supposed to be the same organisation and these additions may be redundant under the current rule but will be introduced for consistency.</p>	<p><b><u>Transferring of information on Eligibility and Approval Status from the Design Holder to Production organisations (Acceptable Means of Compliance)</u></b> <b><u>See JAR 21.4</u></b> <u>Where there is a need to provide visible statement of approved design or airworthiness data, normally outside the design organisation, the following form should be used. The need for a visible statement may be in relation to Company holding a Production Organisation Approval (POA) in relation to JAR 21.163(b). The procedures related to the use of this form should be agreed with the Authority.</u> <u>The form should be completed with the following information as indicated by the different block numbers:</u></p> <p><u>Modify JAR 21.44</u> <u>To make referenc to 21.4 instead of 21.45</u></p> <p><u>Add in JAR 21.118A(a)</u> <u>Make reference to 21.4</u></p> <p><u>JTSO</u> <u>Add in JAR 21.609(f) JAR 21.4</u></p> <p><u>JPA</u> <u>Add in JAR 21.711(b) JAR 21.4</u></p>
ACJ 21.4,	09 AECMA	2 <sup>nd</sup> paragraph-1 <sup>st</sup> sentence replace “should” with “may”	<p>We agree with the intent, but it is essential that the information as defined in the ACJ material will be provided by the design organisation to the production organisation. Various forms or/and electronic means may be used as long as they cover all of the information defined in the ACJ.</p> <p>That is the reason why no JAA form number has been</p>	<p><u>Where there is a need to provide visible statement of approved design or airworthiness data, normally outside the design organisation, the following <i>minimum information</i> should be <i>provided</i>.</u> <u>The need for a visible statement may be in relation to Company holding a Production Organisation Approval (POA) in relation to JAR 21.163(b).</u> <u>Organisations may wish to use the following sample format.</u> <u>Organisations own forms an/or electronic means may be used provided all of the following information is addressed.</u> <u>The procedures related to the use of such forms/electronic means should be agreed with the Authority.</u></p> <p><b><u>DELETE</u></b></p>

			allocated.	<p><u>"The form should be completed with the following information as indicated by the different block numbers:"</u></p> <p><u>and replace with</u> <u>"SAMPLE FORMAT"</u></p>
ACJ 21.4	12 AECMA,	Delete words "Airworthiness Data" in the introduction to the ACJ 21.4	Comment understood However it may be necessary to transmit Airworthiness Data, which is defined in ACJ 21.145(b)(1) (Example AD's) in association with the approved data. Reworded for clarification.	<u>Where there is a need to provide (normally outside the design organisation) a visible statement of approved design data or airworthiness data associated with the approved design data, the following minimum information should be provided.</u>
ACJ 21.4	41 EADS AIRBUS (G)	Approved design is per definition airworthy For the case that "airworthiness data" is a usual term within maintenance, this should be noted in the JAR 21 NPA to avoid confusion	See response to comment 12 In addition Airworthiness Data is no longer used in JAR 145	
ACJ 21.4 Block 1	50.1 DGAC (F)	Block 1 instructions. Add JTSO, JPA	Comment understood and instructions reworded. Under current rules design and production organisation must be the same for JTSO/JPA	Block 1 <b>Company Name:</b> <u>the name of the responsible design organisation TC, STC, DOA, JTSO/JPA Holder or equivalent design approval holder.</u>
ACJ 21.4 Block 3	60 JAA DOASCC	Block 3: Is it planned to re-issue the same form? If yes, how is it controlled?	A unique number. Any subsequent amendments must be traceable and appropriately approved.	Block 3 <b>Ref.:</b> <u>a unique number for traceability purposes. Any subsequent amendments must be traceable and appropriately approved.</u>
ACJ 21.4 Block 10	36 Dassault	Propose different text: Aircraft level approval should be given ( <u>reference to the approved STC, modification or repair</u> ). In addition	Comment understood, further clarification on the purpose of Block 10 is introduced.	Block 10 <b>Purpose of data:</b> <u>The reason for the provision of the information should be stated by the Design Holder.</u> <u>Examples:</u> a) <u>Provision of approved design data to a Production Organisation to permit manufacture (ACJ 21.133(b))</u> b) <u>Information regarding eligibility for installation (replacement</u>

				<p><u>parts, repair, modification etc.)</u>  c) <u>Direct Delivery Authorisation (ACJ 21 133(b))</u></p> <p><b>Note 1:</b> If the data is in support of a major change or repair then reference to the aircraft level approval should be given (<u>make reference to the approved STC, modification or repair</u>).</p> <p><b>Note 2:</b> Any particular limitations associated to the data should be declared in Block 11.</p>
ACJ 21.4 Block 10	62 JAA DOASCC	Block 10: What kind of limitations are addressed, here? Technical limitations are normally fully addressed in technical documentation (e.g. SB). Again avoid duplicate information	The form has been developed to improve liaison between design and production organisation and not between design organisation and other parties, however Block 10 has been developed to clarify its intended purpose.	See above integrated comment
ACJ 21.4 Block 4	2.1 Heavylift Aircraft	To suit international protocol Block 4 to read: MAKE e.g. AIRBUS / BOEING	Comment noted, it is usual within JAR's to make reference to JAA products and organisations	Block 4 <b>Make:</b> the product designator (e.g. Airbus)
ACJ 21.4 Block 4	35 Dassault	MAKE : the product manufacturer name (e.g. Airbus Industry)	Comment noted: Block 1 is for the company name, while Block 4 identifies the general make of the aircraft.	
ACJ 21.4 Block 5	2.2 Heavylift	To suit international protocol Block 5 to read: TYPE e.g. A330/B737	See comment 2.1	Block 5 <b>Type:</b> the type listed on the Type certificate (e.g. A330, A340, Falcon 2000)
ACJ 21.4 Block 5	34 Dassault	Block 5 <b>Type:</b> the type listed on the Type certificate (e.g. A330, A340, Falcon 2000)	Comment accepted	Block 5 <b>Type:</b> the type listed on the Type certificate (e.g. A330, A340, Falcon 2000)
ACJ 21.4 Block 5	42 EADS AIRBUS (G)	Change the name of Block 5 into "ELIGIBILITY" Change the text in the fill in instructions: Block 5 : Eligibility-> used to indicate the Type-approved	Comment accepted but used for Block 6	Block 6 : <b>Eligibility:</b> Indicate the specific Type-approved applications (eg. A300-B2) for which the items affected in the statement are eligible for installation.

		applications for which the items affected in the statement are eligible for installation.		
ACJ 21.4 Block 5	57 SNECMA	Block 5: replace "Type" to "Eligibility" and/or as a minimum to complete the proposed text by saying that " The type listed on the Type Certificate completed as appropriate by the specific or series aircraft, propeller, or engine model, or a reference to a readily available catalogue or manual which contains such information, for example ""A300"	Comment understood, Block 6 revised as above. Reference to catalogue or manual is considered undesirable for the purpose of this statement.	
ACJ 21.4 Block 6	61 JAA DOASCC	What is the purpose of introducing models? Practical problems anticipated; several forms for same equipment, each time there is a new model, links with applicable requirements, that can vary from one model to the other, if block 11 is maintained	The purpose of the revised Block is to provide specific eligibility information which may be limited to one model or may be wider, see revised text	Block 6 : <b>Eligibility:</b> <i>Indicate the specific Type-approved applications (eg. A300-B2, A330-all models) for which the items affected in the statement are eligible for installation.</i>  <b>Change Form Block reference and ACJ 21.4 text under Block 6.</b>
ACJ 21.4 Block 7	10 AECMA	Add "of the" between 'name' and 'organisation" so it reads: " full name of the organisation "	Agreed	<b>Block 7 Issuing Organisation:</b> <u>the full name of the organisation issuing the statement of approved data as authorised under the procedures agreed with the Authority.</u>
ACJ 21.4 Block 11	63 JAA DOASCC	Need for block 11 - Applicable requirements, was debated : DOASCC opinion is that it is not necessary. The objective of the form is to inform on approval status, not to provide all the details of the certification bases, that can be very complex. The	Comment accepted, PSCC concurs with the DOASCC that it is not appropriate to identify the Certification basis in this document. As it is not part of the purpose of the document and might lead to improper use of the information presented. Block 11 will be retained as a general	Block 11 <b>Remarks:</b> <u>State any information, either direct or by reference to supporting documentation that identifies any particular data or limitations(including specific importing requirements) needed by a production organisation to complete Block 13 of the JAA Form One.</u>

		DOASCC also commented that it is not good to duplicate existing information, if not necessary. If people wants to know applicable requirements, they can consult the TCDS, or relevant document.	remarks block to provide the design organisation with an opportunity to record any additional information needed.	
ACJ 21.4 Form	11 AECMA	Under "Statement of Approved design data" Replace "Aircraft" by "Product"	Comment agreed, wording amended according to the current JAR 21 practice.	<u>Product, Part or Appliance Identification and/or documentation</u>
ACJ 21.4 Form	13 AECMA	In declaration replace incorrect reference JAR 21.163(b) with JAR 21.165 and JAR 145.45	Comment noted, reference will be corrected to JAR 21.133(b) and JAR 21.122. As regards JAR 145.45, this has been discussed with Maintenance Division and it was felt that the use of the format for this purpose would lead to confusion.	<u>This Statement provides evidence of "approved design data" as required for JAR 21.133(b) and JAR 21.122.</u>
ACJ 21.4 Form	50.2 DGAC-F	Declaration block should be numbered and documented	Comment agreed, number will be added and following blocks will be renumbered.	<b><u>Declaration</u></b> - <u>The technical information described above is approved : (tick box as appropriate)</u>
ACJ 21.4 Form	50.3 DGAC-F	Reference to 21.130(b) should be added after 21.163(b)	Comment agreed, correction according to comment 13	<u>This Statement provides evidence of "approved design data" as required for JAR 21.133(b) and JAR 21.122..</u>
ACJ 21.4 Form	56 DGAC-F	Title of Form: replace "Aircraft, Aircraft Part " by "Product, Product Part, "	Comment agreed, correction according to comment 11	
ACJ 21.133(b)	32 CAA-UK	Reference is made to PCA, in case of export reference should be made to Authority of country of Import where notification has been received of an alternative standard. Although included in Block 14 useful to include	Comment accepted and wording revised	<u>When the design and production organisations are two separate legal entities the arrangement should also cover the TC/STC/JTSO/JPA Holder acknowledgement that the design data provided, controlled and modified in accordance with the arrangement are recognised as approved by the primary certification authority and therefore the parts and appliances manufactured in accordance with these data and found in condition for safe operation may be released certifying airworthiness. The</u>

		information here		<p><u>acknowledgement should be in the form of an explicit statement and also address any authorisation for direct shipment to end users in order to guarantee continued airworthiness control of the released parts and appliances (direct delivery authorisation).</u></p> <p><b>Note:</b> <u>When there are specific importing requirements which are not met by the design data approved by the Primary Certification Authority, the design organisation should ensure approval of the associated data by the Authority of the importing country.</u></p>
ACJ 21.133(b)	51 DGAC-F	<p>Add after bullet: in the form of an explicit statement <u>according to ACJ 21.4 statement</u></p> <p>Remove end of bullet;...and also address....</p> <p>Create a separate bullet for Direct Delivery authorisation reference</p>	<p>Comment understood but on review this was felt to be more appropriate to the general documented arrangement already required under ACJ 21.133(b).</p> <p>Separate paragraph now addresses the DDA.</p>	<ul style="list-style-type: none"> <li>• The procedures and associated responsibilities to achieve adequate configuration control of manufactured parts, to enable the production organisation to make the final determination and identification for conformity or airworthiness release <u>and eligibility status;</u></li> <li>• .....</li> <li>▪ <u>The arrangement should cover the TC/STC/JTSO/JPA Holder acknowledgement that the approved design data provided, controlled and modified in accordance with the arrangement are recognised as approved by the primary certification authority and therefore the parts and appliances manufactured in accordance with these data and found in condition for safe operation may be released certifying airworthiness.</u></li> </ul> <p><u>When the design and production organisations are two separate legal entities a Direct Delivery Authorisation should be available for direct shipment to end users in order to guarantee continued airworthiness control of the released parts and appliances. Where there is no general agreement for Direct Delivery Authorisation, specific permissions may be granted (refer to ACJ 21.4 for an acceptable format).</u></p>
ACJ 21.133(b)	23.1 Bae Systems Airbus	<p>“Direct delivery Authorisation” is confusing. Normally when production location remote or separate from approved production organisation. From NPA it seems that DDA is used when Production Organisation is separate</p>	<p>Response;</p> <p>Within the JAR system Direct Delivery Authorisation permits direct delivery to the end user by a POA holder and should not be confused with the US Direct Shipment authority on behalf of the Prime at supplier level. The revised text should clarify the</p>	<p>Same text as above</p>



		entity from the Design Organisation	intent.	
ACJ No 1 21.163(b)	14 AECMA	Chapter 1 purpose and scope Add clear definition for new item(s) With respect to new part and Appliances	Comment noted Definition of “new” is to be developed in JAR 1  <b>Action for PSCC</b>	<p>1 PURPOSE AND SCOPE</p> <p>This ACJ relates only to the use of the Certificate for release of ‘New’ <del>itemsparts</del>, i.e. <del>itemsparts</del> which have not previously been used in operational service.</p> <p>Appendix 3 to Section 2 of JAR-145 details use of the Certificate for ‘Used’ <del>itemsparts</del>, i.e. <del>itemsparts</del> which have been used in operational service.</p> <p>The <u>primary</u> purpose of the certificate is <del>to identify the conformity or airworthiness and eligibility of to release</del> products/appliances/parts/components/assemblies (hereafter referred to as ‘<u>itempart(s)</u>’) after manufacture, or to release maintenance work carried out on <del>itemsparts</del> under the approval of a National Aviation Authority (NAA) member of the Joint Aviation Authorities (JAA).</p> <p>The Certificate referenced JAA Form One (Issue 3 or later) is called the Authorised Release Certificate.</p> <p>The Certificate is to be used for export/import purposes, as well as for domestic purposes, and serves as an official certificate for the delivery of <del>itemsparts</del> from the manufacturer/maintenance organisation to users. The Certificate is not a delivery or shipping note.</p> <p>It can only be issued by organisations/person approved by the particular NAA, within the scope of such an approval, or by the National Aviation Authority itself.</p> <p>Aircraft are not to be released using the Certificate.</p> <p>A mixture of ‘New’ and ‘Used’ <del>itemsparts</del> is not permitted on the same Certificate.</p> <p>A mixture of ‘<u>Conformity</u>’ and ‘<u>Airworthiness</u>’ items <u>certified in conformity to ‘approved data’ and to ‘non-approved data’</u> is not permitted on the same Certificate, and consequently only one box in Block 14 can be ticked.</p> <p><u>Note: Modified instructions are in preparation for use of the Authorised Release Certificate under the provisions of Subpart F, which caters for production without organisation approval. See Subpart F and future associated advisory material for details.</u></p>
ACJ No 1 21.163(b)	17 AECMA	All “must “ have to be replaced by “should”	Accepted appropriate wording has been added	<p><u>The information in this block needs to satisfy two objectives:</u></p> <p>1) <u>To relate the Certificate to an organisation</u></p>

		To prescriptive for ACJ material		<p>2) <u>approval, for the purposes of verifying authenticity and authority of the Certificate</u></p> <p><u>To provide a ready means of rapidly identifying the place of manufacture and release, to facilitate traceability and communication in the event of problems or queries. Therefore, the name entered in the box is that of the organisation approval holder who is responsible for making the final determination of conformity or airworthiness, and whose Approval Reference Number is quoted in Block 16. The name should be entered in exactly the same form as appears in the Approval Certificate held by the organisation.</u></p> <p><u>The address(es) entered in Block 4 will assist in the identification of the approval holder AND in identifying the place of release.</u></p> <p><u>If the place of manufacture is one of the organisation addresses listed on the Approval Certificate, then that is the only address needed in this Block.</u></p> <p><u>If the place of manufacture is a location which is NOT listed in the Approval Certificate (e.g. at non-approved subcontractor) then two addresses are required. The first address will be the address of the approval holder (as listed in the Approval Certificate) and a second address entered to identify the place of manufacture and release.</u></p> <p><u>The name of any subcontractor should NOT be entered since, for the purpose of release certifications, the subcontractor location is considered to be an extended part of the approval holder's organisation.</u></p> <p><u>This block may be pre-printed. Logos of the POA holder, etc., are is permitted if the logo it can be contained within the block.</u></p>
ACJ No 1 21.163(b)	37 JAA RD	Replace "Item(s)" by "Component(s)" except in Block 6 and the Block 6 completion instructions. Avoid to introduce new terms.		<p>Block 6</p> <p>The block is provided for the convenience of the organisation issuing the Certificate to permit easy cross-reference to the 'Remarks' Block 13 by the use of <i>line</i> item numbers. <i>Block 6 should be completed where there is more than one line item.</i></p> <p>Where a number of items are to be released on the Certificate, it is permissible to use a separate listing cross-referring Certificate and list to each other.</p>
ACJ No 1	54	The ACJ no longer	The PSCC has an action to	

21.163(b)	DGAC (F)	addresses conformity release of parts within the manufacturing industry, as described in TGM/POA/02	develop guidance material for the movement of parts within the manufacturing industry	
ACJ No 1 21.163(b) ACJ No 4 21.165(b)	28 Bridport Aviation	Clarification required regarding release of components which form part of an approved assembly for approved parts. Not clear that block 14 is appropriate one	Throughout this NPA it is clarified that airworthiness means conformity with approved design data and condition for safe operation (consistent with FAA definition). Need for a definition is recognised for engines, propellers, parts and appliances. Preparation of a TGM will be considered, not to delay publication	
ACJ No 1 21.163(b) ACJ No 2 21.165(b)	38 JAA RD	The Form and its instructions for completion are in ACJ material. Since they contain mandatory clauses they actually belong in Section 1, so standardisation of use will not be realised.	Agreed, but standardisation has already been established. AECMA and AEA supports further standardisation with FAA This subject is already included in the PSCC work program with priority B. Inappropriate mandatory wording within the NPA has been replaced	
ACJ No 1 21.163(b) 1	25 Agusta	Add in Par.1. "Purpose and scope", before Note: "The JAA Form One is an acceptable document to assess the conformity of prototype items. A certificate of conformity released by a Production Organisation recognised by the T.C. applicant/holder is also acceptable. As regard the items to be used for production aircraft's the following apply:	Comment is understood but the justification is not accepted. The PSCC has already an action to develop guidance material for the movement of parts within the manufacturing industry and the proposed text could lead to confusion and is not accepted. Prototype release is already permitted within the Scope of Work using JAA Form One "conformity" (See ACJ N0 1 to 21.165(c)) where requested by	A mixture of 'Conformity' and 'Airworthiness' items <u>certified in conformity to 'approved data' and to 'non-approved data'</u> is not permitted on the same Certificate, and consequently only one box in Block 14 can be ticked.  <u>Note: Modified instructions are in preparation for use of the Authorised Release Certificate under the provisions of Subpart F, which caters for production without organisation approval. See Subpart F and future associated advisory material for details.</u>

		<ul style="list-style-type: none"> <li>▪ Within a company (covered by an approval) there is no need to apply JAA Form One in case of shipping items from one facility to another in the same country.</li> <li>▪ The JAA Form One has to be used if there are shipments from one country to another, even if the facilities are part of one consortium.</li> </ul>	the design holder and the Scope of Work should be extended as necessary.	
ACJ No 1 21.163(b) 1	29 CAA-UK	<p>NPA 21-25 states:</p> <p>The <u>primary</u> purpose of the certificate is <del>to identify the conformity or airworthiness and eligibility of</del> to <u>release</u> products/appliances/parts/components/assemblies (hereafter referred to as '<u>itempart(s)</u>') after manufacture, or to release maintenance work carried out on <u>itemsparts</u> under the approval of a National Aviation Authority (NAA) member of the Joint Aviation Authorities (JAA).</p> <p>NPA 145-11 states: To release parts/components/assemblies after manufacture and to release maintenance work carried out under the approval of a 'JAA full member Authority'</p>	<p>Comment understood standard JAA wording of products, parts and appliances used.</p> <p>The inconsistency about full member authority is known to the Regulation Division is currently under review and further work is outside the scope of this NPA.</p>	<p><b>A INTRODUCTION</b> <i>This ACJ relates only to the use of the JAA Form One for manufacturing purposes. Attention is drawn to Appendix 3 to Section 2 of JAR-145 which covers the use of the JAA Form One for maintenance purposes.</i></p> <p><b>1 PURPOSE AND SCOPE</b> The <u>primary</u> purpose of the Certificate is <del>to identify the conformity or airworthiness and eligibility of</del> to <u>release products, parts and appliances as identified in Blocks 7 through 11 as applicable</u> (hereafter referred to as '<u>itempart(s)</u>') after manufacture, or to release maintenance work carried out on <u>itemsparts</u> under the approval of a National Aviation Authority (NAA) member of the Joint Aviation Authorities (JAA). The Certificate referenced JAA Form One (Issue 3 or later) is called the Authorised Release Certificate. The Certificate is to be used for export/import purposes, as well as for domestic purposes, and serves as an official certificate for the delivery of <u>itemsparts</u> from the manufacturer/maintenance organisation to users. The Certificate is not a delivery or shipping note. It can only be issued by organisations/person approved by the particular NAA, within the scope of such an approval, or by the National Aviation Authority itself. Aircraft are not to be released using the Certificate. A mixture of 'New' and 'Used' <u>itemsparts</u> is not permitted on the</p>

		<b>Consistency in the purpose and scope of both documents is sought.</b>		<p>same Certificate.</p> <p>A mixture of ‘Conformity’ and ‘Airworthiness’ items <u>certified in conformity to ‘approved data’ and to ‘non-approved data’</u> is not permitted on the same Certificate, and consequently only one box in Block 14 can be ticked.</p> <p><u>Note: Modified instructions are in preparation for use of the Authorised Release Certificate under the provisions of Subpart F, which caters for production without organisation approval. See Subpart F and future associated advisory material for details.</u></p>
ACJ No 1 21.163(b) 1	43 EADS AIRBUS (G)	Add a clear definition for new item(s) under Chapter 1 purpose and scope	Comment accepted Definition of “new” is to be developed in JAR 1 <b>Action for PSCC</b>	
ACJ No 1 21.163(b) 2	58 SNECMA	Replace: top copy Certificate By original Certificate  To be consistent with JAR 145 text	Comment accepted. Wording is not part of NPA revision but need for consistency with JAR-145 is recognised. Wording amended.	The <i>original</i> Certificate should accompany the <u>itemsparts</u> and correlation should be established between the Certificate and the <u>itempart(s)</u> . A copy of the Certificate should be retained by the organisation that manufactured the <u>itempart</u> . Where the Certificate format and the data is entirely computer generated, subject to acceptance by the NAA, it is permissible to retain the Certificate format and data on a secure database.
ACJ No 1 21.163(b) 3 Block 12	48.2 LBA	, the <b>appropriate approved design data and are in condition for safe operation</b> or <b>non-approved design data specified in block 13 box</b> is to be marked, and Block 15 is to be signed.	Comment noted as the completion instructions for Block 14 are specified, and the instructions in Block 12 are just a reminder, the wording has been simplified to mention “the appropriate box”.	<p>Block 12 Enter one or a combination of appropriate standard words from the following table. The table lists, in quotes, the standard words permitted for use when releasing new <u>itemsparts</u> prior to entry into service, i.e. the <u>itemsparts</u> have not been previously used in operational service. It also details the circumstances and conditions under which they may be used. In all cases the certification rules relating to Block 14 apply, the <i>appropriate box</i> is to be marked, and Block 15 is to be signed.</p> <p><b>TABLE OF STANDARD WORDS FOR NEW ITEMSPARTS</b></p> <p>1 ‘MANUFACTURED’</p> <p>a The production of a new <u>itempart</u> in conformity with the applicable design data, or</p>

				<p>b Re-certification by the original manufacturer after rectification work on a <u>item</u>part, previously released under 1(a) above, which has been found to be unserviceable prior to entry into service, e.g. defective, in need of inspection or test, or shelf life expired. Details of the original release and the rectification work are to be entered in Block 13, or Re-certification of new <u>item</u>sparts <i>from Conformity purpose to Airworthiness purpose</i> at the time of approval of the applicable design data, provided that the <u>item</u>sparts conform to the approved design data. An explanation of the basis of release and details of the original release are to be entered in Block 13.</p>
ACJ No 1 21.163(b) 3 Block 12	59 SNECMA	<p>NPA 21-25 defines standard words:  <b>“Manufactured, Inspected/Tested, Modified Overhauled, Inspected/Tested, Modified, Repaired, Reassembled.</b>          NPA 145-11 defines terms:  <b>Overhauled, Inspected/Tested, Modified, Repaired, Reassembled.</b>          FAA Order 8130.21B defines:  <b>Repaired, Inspected, Rebuilt, Altered, New, Newly overhauled, Prototype.</b></p> <p>In order to successfully harmonise, an unique list of standard terms should be established for both JAA Form One and 8130-3. Are NPA’s 21-25 and 145-11 the source for this words?</p>	<p>It must be recognised that JAA and FAA regulatory systems are still different and these contain the specific wording. It is not necessary for succesfull harmonisation of JAA Form One/FAA 8130-3 to have identical wording. Guidance material regarding acceptable wording when receiving FAA 8130-3 will be drafted in conjunction with Maintenance Division.          The JAR 21 /JAR 145 wording for Inspected/Tested and Modified are not identical and this is deliberate to reflect the different environments.</p>	
ACJ No 1	19	Add text originating from	Comment agreed, however	It is mandatory to state any information in this block, either direct or

21.163(b) 3 Block 13	AECMA	<p>Block 14 after 1<sup>st</sup> paragraph (see also remark 20 under ACJ No 1 21.163(b) 3 Block 14)</p> <p>When used for conformity the word “CONFORMITY” must be entered in capital letters. In addition , an explanation of the products/part’s use, (e.g., pending approved data, TC pending, for test only, etc.) shall be provided.</p>	correct statement from Block 14 has been used.	<p>by reference to supporting documentation, that identifies particular data or limitations relating to the <u>item</u>parts being released that are necessary for the User/Installer to make the final airworthiness determination of the <u>item</u>part. The information should be clear, complete, and provided in a form and manner which is adequate for the purpose of making such a determination.</p> <p>Each statement should be clearly identified as to which item it relates.</p> <p>If there is no statement, state `None'.</p> <p>Examples of conditions which would necessitate statements in Block 13 are:</p> <p><b>Insert new Bullet point 1</b></p> <ul style="list-style-type: none"> <li>▪ <u>When the certificate is used for Conformity purposes the following statement should be entered at the beginning of Block 13 ‘ONLY FOR CONFORMITY, NOT ELIGIBLE FOR INSTALLATION ON TYPE CERTIFICATED AIRCRAFT/ENGINE/PROPELLER’.</u></li> </ul>
ACJ No 1 21.163(b) 3 Block 13	55 DGAC-F	Add a bullet point about release of parts or appliances approved in a non-JAA country, as indicated in TGM POA 05, para 5	Comment is accepted and a new bullet point is added. The PSCC understand that JAR 21.1 requires revision to make it clear that non JAA products may be produced under JAR 21.	<p><b>Insert bullet point</b></p> <ul style="list-style-type: none"> <li>• <i>When the Authority approving the design data is not a full JAA member NAA, then the Authority responsible for the approval of the design data should be identified and the following statement should be entered together with a reference identifying the approval: “Design data approved by &lt;identify the responsible Authority and the approval reference&gt;”.</i></li> </ul>
ACJ No 1 21.163(b) 3 Block 13	23.2 Bae Systems Airbus	“Direct Delivery Authorisation” is confusing. Normally when production location remote or separate from approved production organisation. From NPA it seems that DDA is used	Refer to answer to comment 23.1 and ACJ 21.133(b)	TC/STC/JTSO direct shipment authorisation reference when POA holder is a separate legal entity (see ACJ 21.133(b)). The following statement should be used: <u>“Direct Delivery Authorisation granted by [Company name] under document reference [Contract/Letter/Form XX/Quality Plan].</u>

		when Production Organisation is separate entity from the Design Organisation		
ACJ No 1 21.163(b) 3 Block 14	20 AECMA	The 2 <sup>nd</sup> and 3 <sup>rd</sup> paragraphs of Block 14 relating to conformity, should be deleted as stated under remark 19 on ACJ No 1 21.163(b) 3 Block 13	Comment noted deletion not agreed as Block 14 needs to identify Airworthiness purpose and Conformity purpose. See answer to comment 19 for revised wording to clarify intent.	<u>The certificate can also be used as a Conformity Certificate when items conform to applicable design data which are not approved for a reason which is stated in Block 13 (e.g. pending type certificate, for test only, pending approved data).</u>  <u>In this case the following additional statement should be entered at the beginning of Block 13 itself and not in a separate document: 'ONLY FOR CONFORMITY, NOT ELIGIBLE FOR INSTALLATION ON TYPE CERTIFICATED AIRCRAFT/ENGINE/PROPELLER'.</u>
ACJ No 1 21.163(b) 3 Block 14	53 DGAC-F	Block 14: The first paragraph should be divided in two parts: <u>The main purpose of the Certificate is to release items for Airworthiness purposes, which mean conformity to approved design data and in condition for safe operation.</u>  <u>When using the JAA Form One for this purpose to export engines or propellers under JAR 21.325(a)(2) 'approved' means approved by the authority of the country of import. (see specific information in block 13)</u>	Comment understood. At present the general case is to release products, parts and appliances without certifying compliance with import requirements. However in case of notified import conditions compliance with import requirements may still be certified according to JAR 21.331(a)(2). Text reworded to clarify.	<u>The main purpose of the Certificate is to release items for Airworthiness purposes, which means conformity to approved design data and in condition for safe operation.</u> <u>This airworthiness certification is considered by the JAA to be valid worldwide unless there are specific notified import conditions.</u>  <u>When using a JAA Form One issued for Airworthiness purposes to satisfy such notified import conditions, compliance with these import conditions is certified according to JAR 21.331(a)(2). As the P/N is stated in Block 8 and compliance with any specific import conditions is entered in Block 13, 'approved' then means approved by the authority of the country of import</u>
ACJ No 1 21.163(b) 3 Block 18	48.3 LBA	The date on which Block 15 is signed, in the format day/month/year. <u>The month should be stated in letters e.g. Jan, Feb, Mar etc. (use English abbreviations).</u>	Comment understood, additional guidance provided.	The date on which Block 15 is signed, in the format day/month/year. <u>The month should be stated in letters (sufficient letters should be used so there can be no ambiguity as to the month intended.)</u>
ACJ No 1	16	Delete this paragraph since	Comment understood, the	<u>If the place of manufacture and release is a location which is NOT</u>



21.163(b) 3 Block 4	AECMA	the subcontractor is under the control of the POA holder, as described in ACJ 21.139. Therefore the second address is considered redundant.	example between brackets was misleading and was deleted. The address of the POA holder location responsible for the release should always be on the JAA Form One.  Guidance material on this subject needs to be developed by the PSCC.	<u>listed in the Approval Certificate then two addresses are required. The first address must be the address of the approval holder (as listed in the Approval Certificate) and a second address must be entered to identify the place of manufacture and release.</u>
ACJ No 1 21.163(b) 3 Block 4	44 EADS AIRBUS (G)	There is a confusion between place of manufacturer and place of release. Please clarify. Example: POA (place A) orders a part by a subcontractor (not POA); (place B). ▪ Subcontractor shipped the part to POA (place A) ▪ POA (place A) will ship the part to the end user. What has to be filled in block 4? 1. Address of POA (place A) -> OK 2. Place of manufacture (place B) ? or Place of release (place A) ?	Comment understood place of release and manufacture cannot be split. Text has been revised to clarify, see comment 16. Block 4 has to be filled with the address and the place of manufacture and release.	<b>Review Block 4 to always link manufacture and release.</b>
ACJ No 1 21.163(b) 3 Block 4	45 EADS AIRBUS (G)	<b>Delete the text as copied in column 5</b> since: The possibility and the relevant criterions that a subcontractor is nominated as an “extended part of the approval holder’s org.” is not yet incorporated in the JAR 21. It looks like a FAA-possibility subpart G	Comment agreed and paragraph will be deleted.  PSCC has action to develop guidance material	<b><i>DELETE:</i></b> <u>The name of any subcontractor should NOT be entered since, for the purpose of release certifications, the subcontractor location is considered to be an extended part of the approval holder’s organisation.</u>

ACJ No 1 21.163(b) 3 Block 4	52.1 DGAC-F	If the place of manufacture is a location which is NOT listed in the Approval Certificate ( <b>e.g. at subcontractor without POA</b> ) then two addresses are required. The first address must be the address of the approval holder (as listed in the Approval Certificate) and a second address must be entered to identify the place of manufacture and release.	Comment understood and problem resolved by modification to text as made under comment 16	
ACJ No 1 21.163(b) 3 Block 5	52.2 DGAC-F	<del>Completion of this block is optional.</del> Its The purpose of this block is to reference work order/contract/invoice or any other internal organisational process such that a fast traceability system can be established. <u>The use of the block for such traceability Completion of this block is strongly recommended in the absence of itempart Serial Numbers or batch number. When not used, state N/A.</u>	Comment accepted	<del>Completion of this block is optional.</del> Its The purpose of this block is to reference work order/contract/invoice or any other internal organisational process such that a fast traceability system can be established. <u>The use of the block for such traceability Completion of this block is strongly recommended in the absence of itempart Serial Numbers or batch numbers. When not used, state N/A.</u>
ACJ No 1 21.163(b) 3 Block 9	18 AECMA	Use wording based upon new FAA Order 8130.21C with modifications for JAA See APPENDIX with AECMA proposal.  Block 9 Used to indicate the Type-Approved products for which the released items are eligible for installation. The	Comment understood, text has been amended to harmonise with latest FAA order 8130-21C as much as possible.  Complete identity is not practical given that this ACJ is aimed specifically at the release of new products, parts and appliances.	Used to indicate the Type-Approved applications for which the released <u>itemsparts</u> are eligible for installation, <u>based on the information provided by the design approval holder by virtue of the arrangement described in JAR 21.4 and 21.133(b).</u> The following entries are permitted: a The specific or series aircraft, propeller, or engine <i>model as identified by the design approval holder. In case of JTSO articles state "JTSO article N/A" since eligibility for installation for JTSO articles is determined at the time of installation.</i> Db 'None', to be used only when it is known that the <u>itemsparts</u> do

	<p>following entries are permitted:</p> <ol style="list-style-type: none"> <li>(1) Enter the aircraft, aircraft engine, or propeller make and model on which the product/part is eligible for installation. Where parts are JTSO articles, state "JTSO Article N/A" since eligibility for installation for JTSO articles is determined at the time of installation.</li> <li>(2) Product/part make and model entries in this block may not be all inclusive; there may be eligibility for other products/parts make and Models.</li> <li>(3) When <b>using a JAA Form One with non-approved design data</b> for products/parts, enter N/A.</li> </ol> <p>NOTE: <b>JAA Form One</b> does not constitute authority to install a product/part on a particular aircraft, aircraft engine, or propeller. The USER OR INSTALLER IS RESPONSIBLE FOR CONFIRMING THAT THE PRODUCT/PART IS ELIGIBLE FOR INSTALLATION via</p>		<p>not yet have a Type-Approved application, for example: pending type certificate, for test only, pending approved data. If this category is used, then appropriate explanatory information must be provided in Block 13 and new <u>item</u>sparts may only be released for Conformity purposes.</p> <p>Bc 'Various', if known to be eligible for installation on more than one model of Type-Approved product, unless the originator wishes to restrict usage to a particular model installation when it should so state. This includes items which have independent approved status and which may be eligible for use in a number of different applications, e.g. appliances for which JTSO Authorisation has been issued in accordance with JAR-21, Sub-part O.</p> <p>e 'Unknown', if eligibility is unknown.</p> <p><u>NOTE 1: In the case of multiple Type-Approved application it is acceptable for this block to contain cross reference to another readily available document which lists such applications.</u></p> <p>NOTE 2: Any information in Block 9 does not constitute authority to fit the <u>item</u>part to a particular aircraft, engine or propeller. The User/Installer should confirm via documents such as the Parts Catalogue, Service Bulletins, etc., that the <u>item</u>part is eligible for the particular installation.</p> <p><u>NOTE 3: Any information in Block 9 does not necessary mean that the product, parts or appliances are only eligible for installation on the listed model(s). Nor does it guarantee that the product, parts or appliances are eligible for installation on all entries in Block 9. Eligibility may be effected by modification or configuration changes.</u></p>
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		<b>approved</b> documents in compliance with the applicable JAR.		
ACJ No 1 21.163(b) 3 Block 9	27 Cessna Aircraft Comp.	Essentially the situation for JAR 21 and JAR 145 is the same. For a new item eligibility can be defined at its release, this can immediately change through an AD. Consequently the NPA 145-11 proposal to make block 9 optional should also be available in NPA 21-25 It is suggested to change: <b>Block 9 Eligibility (optional)</b>	Comment not accepted fundamental objective of the harmonisation process. At time of release at least one eligibility should be established to enable Airworthiness release for a new part.	
ACJ No 1 21.163(b) 3 Block 9	30 CAA-UK	Block 9 states that ‘Various’ is to be used only for complete engines, propellers, or JTSO items where known to be eligible for more than one type-approved application, but the intended application is not known. NPA 145-11 on the other hand, does not apply the same restrictions and would appear that any ‘item’ can use the term ‘Various’. Is this difference intentional?	Response: There will be inevitable differences between production and maintenance, eligibility has been amended Various has been deleted from production use (see comment 18)	
ACJ No 1 21.163(b) 3 Block 9	48.1 LBA	Øb `None', to be used only when it is known that the <del>items</del> <del>parts</del> do not yet have a Type-Approved application, for example: pending type certificate, for test only, pending approved data. If this	Comment understood, text has been revised to read “released for Conformity purposes (see comment 18)	

		category is used, then appropriate explanatory information must be provided in Block 13 and new <del>items</del> parts may only be given ‘ <b>non-approved design data specified in block 13</b> ’ release.		
ACJ No 1 21.163(b) 3 Block 9	52.3 DGAC-F	<u>NOTE 1: In the case of multiple Type-Approved application it is acceptable for this block to contain cross reference to an attached document which lists such applications.</u>	Comment agreed, text changed.	<u>NOTE 1: In the case of multiple Type-Approved application it is acceptable for this block to contain cross reference to an attached document which lists such applications.</u>
ACJ No 1 21.163(b) Form Block 14	15 AECMA	JAA-Form One block 14 new statement. The new text “approved are in condition for safe operation raised the question : what is the meaning of “condition for safe operation” for items (especially parts and appliances) and which are the criterions to determine it. It is necessary to give some criterions in the same form for items <ul style="list-style-type: none"> <li>▪ Engine</li> <li>▪ Propeller</li> <li>▪ Parts</li> <li>▪ Appliances</li> </ul>	Refer to comment 40	<b>Text to be transferred from Block 6</b>
ACJ No 1 21.163(b) Form Block 14	46 EADS Airbus (G)	Literally exactly same remark (originating from EADS-GmbH) as remark 15 (originating from AECMA)	Refer to comment 40	
ACJ No 4	31	Comment to NPA 21-25	Comment accepted, text revised	- <u>As a conformity Certificate, only when by virtue of the</u>

21.165(c)	CAA-UK	- <u>As a conformity Certificate, only when by virtue of the arrangement described in JAR 21.133(b), it can be determined that the part <b>conforms to applicable design</b> data which is not (yet) approved, for a reason that is indicated in Block 13. Parts released with a JAA Form One as a conformity Certificate are not eligible for installation in a type certificated aircraft.</u>		<u>arrangement described in JAR 21.133(b), it can be determined that the part <b>conforms to applicable design</b> data which is not (yet) approved, for a reason that is indicated in Block 13. Parts released with a JAA Form One as a conformity Certificate are not eligible for installation in a type certificated aircraft.</u>
ACJ No 4 21.165(c)	33 CAA-UK	Comment to NPA 21-25 & NPA 145-10 2 <sup>nd</sup> bullet point (NPA Page 19). This paragraph would benefit from being reworded to clarify when the Form should be used as a release certificate for conformity. The words as under remark 31 are suggested	Comment accepted, text revised under comment 31	
ACJ No 4 21.165(c) Note	24 Bae Systems Airb	NOTE: The JAA Form One should only be used as a conformity certificate when it is possible to indicate the reason that prevents its issue as an airworthiness release.	Comment agreed, text changed	NOTE: <i>The JAA Form One should only be used for Conformity release purposes when it is possible to indicate the reason that prevents its issue as for Airworthiness release purposes.</i>
ACJ 21.331(a) (2)	22 AECMA	<u>ACJ 21.331(a)(2) Additional Requirements for Export (Acceptable Means of</u>	Comment understood, text amended for clarification	<u>ACJ 21.331(a)(2) Use of Authorised Release Documents for Export - Additional Requirements for Import (Interpretive Material)</u>

		<u>Compliance)</u> Since JAR 21.331 (Subpart L) is dealing with Export Airworthiness Approvals, to be met by the Exporter and required by the importing country		
ACJ 21.331(a)(2)	47 EADS Airbus (G)	Change "Import" in the headline to "Export"	Comment understood, text amended for clarification	<u>ACJ 21.331(a)(2)</u> <u>Use of Authorised Release Documents for Export - Additional Requirements for Import (Interpretive Material)</u>

NPA 21-25 page 17 paragraph 4 to be modified with respect to date of publication