

## Exporting an aircraft or aircraft component

Are you thinking of exporting an aircraft or component? If so, you must deregister the aircraft and you may need an export airworthiness certificate and approval of a temporary ferry fuel system modification.

This document covers aspects of exporting an aircraft or aircraft component, which involve the Civil Aviation Authority of New Zealand (CAA). It does not cover any other aspects of exporting an aircraft or component, which may involve customs, taxes, financial aspects, export of antiquities, etc.

### Export of an aircraft

First, it is important to note that “export” of an aircraft in this context relates to when an aircraft is removed from the New Zealand Register of Aircraft, known as “de-registration”, and not when the aircraft physically leaves the country. As long as an aircraft is entered on the New Zealand Register of Aircraft, regardless of where in the world it is positioned or operating, it is a New Zealand aircraft and must comply with New Zealand Civil Aviation Rules.

An aircraft may be “exported”, ie, removed from the New Zealand Register of Aircraft, (de-registered), while it is still in New Zealand or when it is already positioned in another country.

The one activity, which always involves the CAA when an aircraft is being exported is:

- [De-registration of the aircraft](#)

There are two other principal activities, which may involve the CAA when an aircraft is being exported:

- [Issue of an export airworthiness certificate](#)
- [Approval of a temporary ferry fuel system modification](#)

A block diagram showing the sequence of events for each of the above two activities is given [here](#).

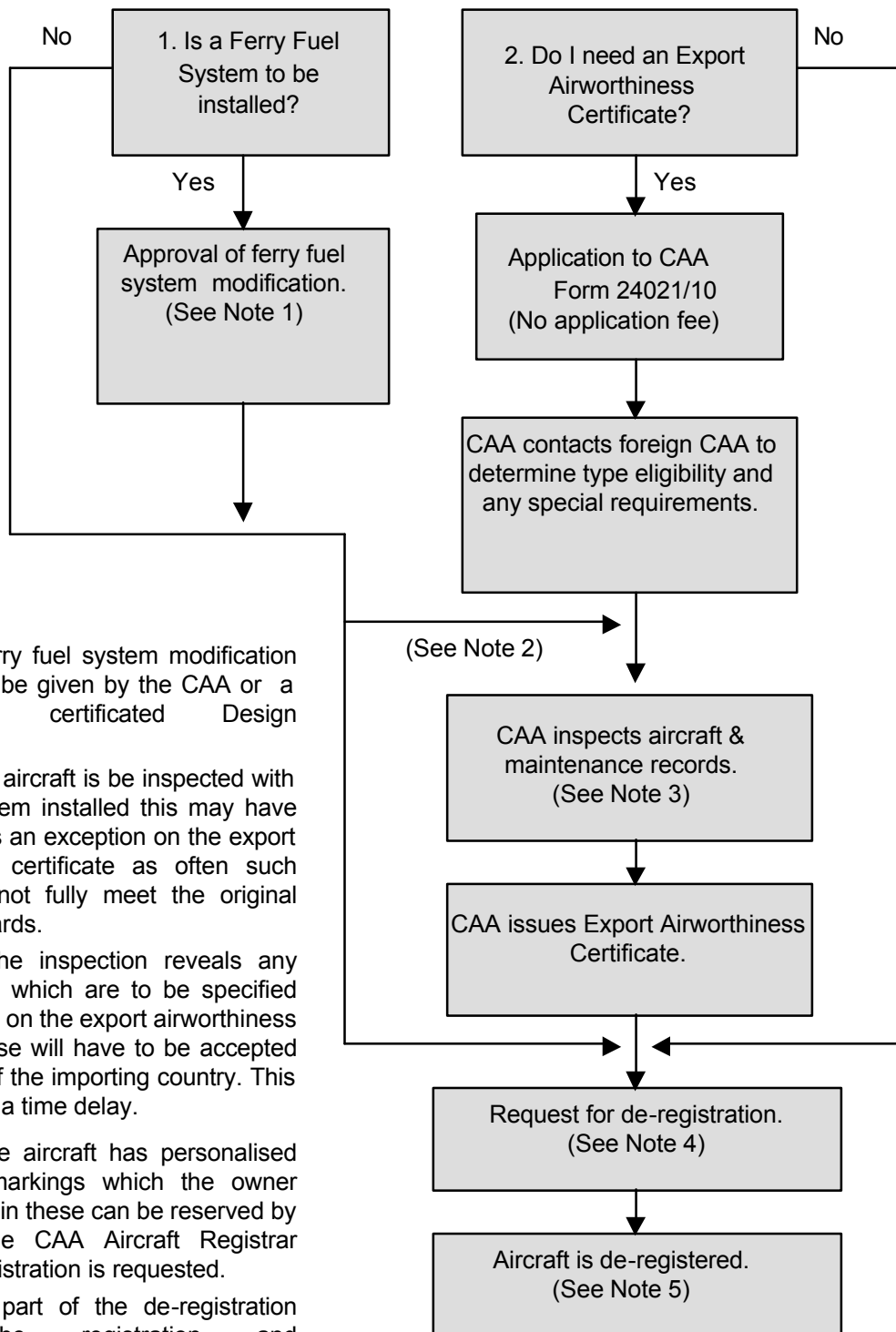
### Export of aircraft components, including aircraft engines and propellers

Aircraft engines, propellers, and other aeronautical products may be exported separately. In this case, “export” does mean simply shipping of the component from New Zealand to a foreign country. It is very important that they are accompanied by the correct documentation to ensure they are acceptable to the importing country.

Guidance on the export of aircraft components is given [here](#).

## THE AIRCRAFT EXPORT PROCESS

(Two separate paths each to be followed.)



### **NOTES**

**Note 1.** A ferry fuel system modification approval can be given by the CAA or a Part 146 certificated Design Organisation.

**Note 2.** If the aircraft is to be inspected with the ferry system installed this may have to be listed as an exception on the export airworthiness certificate as often such systems do not fully meet the original design standards.

**Note 3.** If the inspection reveals any discrepancies which are to be specified as exceptions on the export airworthiness certificate these will have to be accepted by the CAA of the importing country. This could impose a time delay.

**Note 4.** If the aircraft has personalised registration markings which the owner wishes to retain these can be reserved by contacting the CAA Aircraft Registrar before de-registration is requested.

**Note 5.** As part of the de-registration process the registration and airworthiness certificates are revoked. Therefore if it is later desired to return the aircraft to the NZ register this will involve a complete "re-entry" process.

AIRCRAFT IS "EXPORTED"

## **Export airworthiness certificate - aircraft**

An export airworthiness certificate is a document designed to assist the official transfer of an aircraft from one national airworthiness authority to another. It is primarily aimed at the authority of the importing country, to facilitate the transfer from the register of the exporting country, and is not primarily intended for the use of the aircraft purchaser or importer.

The export airworthiness certificate attests to conformity of the aircraft to the aircraft type certificate, including compliance with all airworthiness directives and maintenance requirements. It does not attest to compliance with any agreements or contracts between the vendor and purchaser, nor does it constitute authority to operate the aircraft.

The export airworthiness certificate is valid on the day it is issued. It is effectively a “snapshot” of the aircraft and its supporting documentation on that day.

### **Do I need an export airworthiness certificate?**

There is no Civil Aviation Rule that says you must get an export airworthiness certificate to export an aircraft. Whether you need one or not is largely down to the requirements of the national airworthiness authority of the importing state and/or the intending foreign owner/operator.

The CAA strongly advises an exporter to obtain an export airworthiness certificate, as this should facilitate the entry of the aircraft onto the register of the country it is being exported to. As part of the issue of an export airworthiness certificate, the CAA will ensure the aircraft meets the requirements of the importing country, so the exporter would know in advance that the aircraft is basically acceptable to the importing country.

In addition, in the case of aircraft being exported to the USA, the bilateral airworthiness agreement between the USA and NZ requires aircraft being transferred between the two countries to be accompanied by an export airworthiness certificate.

### **Eligibility**

Only aircraft, which have been type certificated or type accepted in New Zealand, are eligible for issue of an export airworthiness certificate. Amateur-built aircraft, warbird aircraft or any other aircraft holding an airworthiness certificate in the Special category are not eligible.

This is because an export airworthiness certificate certifies conformity to a Type Certificate, and only aircraft that have been type certificated are eligible. If that type certificate was issued outside New Zealand, it must have been accepted in New Zealand under the Type Acceptance process.

### **How do I obtain an export airworthiness certificate?**

Only the CAA can issue an export airworthiness certificate. The aircraft owner or their appointed agent applies to the CAA for issue of an export airworthiness certificate using CAA form [24021/10](#). No application fee is payable so application may be made by fax.

The general requirements for issue of an export airworthiness certificate are given in [Civil Aviation Rule Part 21L](#).

An aircraft is eligible for issue of an export airworthiness certificate when the following requirements, as specified in CAR 21.331, have been met:

- a) It would be eligible for issue of a New Zealand airworthiness certificate. (This does not mean simply that the aircraft currently has a valid NZ airworthiness certificate. It means that on the date of inspection for the export airworthiness certificate, it meets all the requirements for issue of a NZ airworthiness requirement, as specified in rule 21.191.)

- b) The aircraft has had a 100 hr/annual inspection, or equivalent inspection, within the preceding 60 days.
- c) The aircraft meets the requirements of the importing state, in that:
  - i) The aircraft conforms to a type design acceptable to the importing state; and
  - ii) Any special conditions of the importing state are met; and
  - iii) Any exceptions are acceptable to the importing state.

### **CAA actions**

In practice, there are two largely separate CAA activities involved with the issue of an export airworthiness certificate. These are:

- a) **DETERMINING THE REQUIREMENTS OF THE IMPORTING STATE** - If requested to by the applicant the CAA will contact the authority of the importing state on behalf of the applicant to determine whether the basic aircraft type design is acceptable to them and whether they have any special requirements.

The CAA maintains a database of aircraft types and countries, which have advised that the aircraft type is acceptable to them, to minimise the number of new enquiries that must be made. For aircraft being returned to their country of manufacture it can be assumed that the basic type design is acceptable to them.

Another requirement for acceptance by the importing country relates to exceptions. An exception is a discrepancy, which could consist of a non-conformity with the type design or a non-conformity to a New Zealand Civil Aviation Rule, which must be listed on the export airworthiness certificate. A ferry fuel system that does not fully meet applicable airworthiness requirements would be a typical exception appearing on an export airworthiness certificate. If there are any exceptions, these need to be agreed to by the importing country prior to the issue of the certificate. It is important therefore to identify any exceptions early as obtaining acceptance of these can be time-consuming.

- b) **CAA INSPECTION OF THE AIRCRAFT AND MAINTENANCE RECORDS** – This inspection is basically the same as would occur if the CAA was carrying out an inspection for initial issue of a New Zealand airworthiness certificate. The CAA will review all the aircraft maintenance records and inspect the aircraft to ensure the aircraft conforms to its basic type design, complies with all applicable New Zealand Rules including airworthiness directives, and is in a condition for safe operation.

The CAA will give full details of this inspection at the time of application for issue of the export airworthiness certificate. In general, the CAA will not carry out the inspection until the requirements of the importing country are known.

As the export airworthiness certificate is only valid on the date of issue the certificate must be issued very close to the actual date of inspection. If there are any delays between the inspection and the issue of the certificate, which could be caused by discrepancies found during the inspection, which requires either rectification or listing the discrepancy as an exception on the export airworthiness certificate, (which itself requires the acceptance of the CAA of the importing country), a further inspection may be required.

### **How much does it cost?**

There is no initial application fee but the standard CAA fee of NZ\$133 per hour including GST applies. For a typical general aviation aircraft where there were no complications a typical time for the complete job would be between 8 and 12 hours. If the aircraft is a more complex type or there were exceptions on the export airworthiness certificate, which required additional liaison with the airworthiness authority of the importing country, this could increase the cost of the job.

**Can I get an export airworthiness certificate for an incomplete or un-airworthy aircraft?**

It may be possible to obtain an export airworthiness certificate for an incomplete or otherwise un-airworthy aircraft, (such as an accident damaged aircraft.) This will depend on the CAA of the importing country. The components missing or the reason for the aircraft not being airworthy will have to be specified accurately as an exception on the export airworthiness certificate, and this exception would have to be accepted by the CAA of the importing country prior to the issue of the certificate.

**Contact the aircraft certification unit**

If you would like further details about the issue of an export airworthiness certificate, or an estimate of the cost of obtaining an export airworthiness certificate for your aircraft, contact the [CAA Aircraft Certification Unit](#).

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## Export of products other than an aircraft

### Aircraft engines and propellers

As with aircraft, only aircraft engines or propellers which have been type certificated are eligible for export documentation. Aircraft engines and propellers have two options for export documentation:

- a) An export airworthiness certificate; or
- b) An Authorised Release Certificate - Airworthiness Approval Tag (CAA Form One).

### EXPORT AIRWORTHINESS CERTIFICATE

An export airworthiness certificate for an aircraft engine or propeller is issued in the same basic way as applies for a complete aircraft. That is:

- a) The aircraft engine or propeller must conform to its type design and be in a condition for safe operation; and
- b) The aircraft engine or propeller must have had a 100 hr or equivalent inspection within the previous 60 days; and
- c) The basic type design must be acceptable to the State of Import, and
- d) Full maintenance records must be available including original certification documentation of any finite life limited components.

Ideally, the aircraft engine or propeller will be newly overhauled, or installed on an airworthy aircraft. If the aircraft engine or propeller is not currently installed on an airworthy aircraft, or newly overhauled, full details of the aircraft it was last installed on and the reason for removal will be required.

An application using the same form [CAA 24021/10](#) is made to the CAA. The same two-stage process is involved, except it is more likely that the foreign CAA will not need to be contacted unless exceptions on the certificate are involved. An inspection of the aircraft engine or propeller by the CAA is required, but as it is not always possible to determine the condition of an aircraft engine or propeller by inspection, the accuracy and completeness of the maintenance records is extremely important.

### AUTHORISED RELEASE CERTIFICATE – AIRWORTHINESS APPROVAL TAG

An Authorised Release Certificate - Airworthiness Approval Tag (CAA Form One) can only be issued by a Part 145 certificated maintenance organisation.

If the export of a used aircraft engine or propeller using a CAA Form One was contemplated then the advice of a Part 145 certificated maintenance organisation should be sought. The conformity of the aircraft engine or propeller to the approved type design and the fitness for return to service must be able to be determined. It is likely that a Part 145 certificated maintenance organisation would only be prepared to issue a CAA Form One in respect of an aircraft engine or propeller which it had either **newly overhauled**, or **carried out maintenance on** and for which it had issued a certificate of release to service.

## OTHER PRODUCTS

The only products other than complete aircraft, engines or propellers which are eligible for issue of export documentation are;

- a) Aircraft components which are part of the approved type design of a type certificated aircraft, engine or propeller; or
- b) Products covered by a TSO approval or a PMA approval issued in accordance with NZCAR Part 21 Subparts O or P.

The export documentation for such products is the Authorised Release Certificate - Airworthiness Approval Tag (CAA Form One). (The CAA Form One is equivalent to the FAA 8130-3, the JAA Form One, the Canadian TC24-0078 and the Australian CASA DA1. It is hoped that these forms will be harmonised by December 2000.)

A CAA Form One can only be issued by a Part 148 certificated manufacturing organisation, in the case of **newly manufactured parts**, and by a Part 145 certificated maintenance organisation, in the case of **used parts**.

If the export of used aircraft components was contemplated then the advice of a Part 145 certificated maintenance organisation should be sought. The conformity of the component to the approved type design and the fitness for return to service must be able to be determined. If the component is not newly overhauled full details of the aircraft it was last installed on, and the reason for removal, will be required. If the component has a finite fatigue life specified then the complete service history of the component will be required including the original delivery certification documentation.

Information on the issue and use of the CAA Form One is given in [Advisory Circular AC 43-3](#).

## De-registration of an aircraft

An aircraft can only be registered in one country at any one time. Another country will not register an aircraft until it has received official notification that the aircraft has been removed from the register of the exporting country (de-registered). This is an ICAO requirement, which is specified in [Civil Aviation Rule Part 47](#) para 47.51(b).

Therefore at some stage an aircraft being exported must be removed from the New Zealand Register of Aircraft (de-registered). Otherwise it remains a New Zealand aircraft and has effectively not been “exported”. However, the timing of de-registration can be very important.

The New Zealand Certificate of Registration is not a certificate of title. The “owner” in New Zealand is simply the person who operates the aircraft for 28 days or more.

To de-register an aircraft, use form 24047/05, or if the owner is not available to sign, use form 24047/05A. The CAA does not concern itself with any financial aspects of the aircraft’s legal ownership.

Once the aircraft has been de-registered it cannot then be flown until it has been registered in an ICAO country and issued with an appropriate flight authorisation document.

As part of the de-registration process the CAA revokes both the Certificate of Registration and, if one has been issued to the aircraft, the Airworthiness Certificate. For this reason it is very important that de-registration is requested at exactly the point desired by the registered owner. Once the de-registration has been effected, and the Airworthiness Certificate has been revoked, if it was desired for any reason to return the aircraft to the New Zealand Register of Aircraft it would be treated as a completely new entry with the attendant costs and CAA inspections that the re-entry would involve. Similarly, until the aircraft is de-registered, it must comply with all New Zealand requirements in respect of operation, maintenance and personnel licensing.

Once the aircraft has been de-registered and the Certificate of Registration and the Airworthiness Certificate, if issued, have been revoked both certificates should be returned to the CAA.

Once the aircraft has been de-registered the registration marks of that aircraft (eg, ZK-XYZ) become dormant for a period of 12 months before they would be available for use on another aircraft. If an aircraft carries personalised markings the owner will be given the option of reserving the marks again for their use.

For any questions on de-registration or personalised marks contact the [aircraft registrar](#).

Full details of the Rules covering registration are given in [Civil Aviation Rule Part 47](#) and the associated [Advisory Circular AC 47-1](#).

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