



U.S. Department  
of Transportation

**Federal Aviation  
Administration**

# Memorandum

Subject: **ACTION:** Procedures for the issuance of FAA Form 8130-3, *Airworthiness Approval Tag*, for Parts Manufacturer Approval (PMA) parts exported to France, Italy, Netherlands, Sweden, and the United Kingdom

Date: December 19, 2002

From: Manager, Production and Airworthiness  
Division, AIR-200

Reply to  
Attn. of:

To: All Manufacturing Inspection Offices  
All Manufacturing Inspection District/Satellite Offices  
All Certificate Management Offices  
All Certificate Management Units

The Aircraft Certification Service has recently been notified by the Direction Générale de l'Aviation Civile (DGAC) of France that Airworthiness Approval Tags, FAA Form 8130-3, issued for PMA parts being exported to France and other European countries, do not contain the importing countries' required statements in Block 13, Remarks. This memorandum explains the importing countries' requirements on Form 8130-3 for PMA parts exported to certain European countries, and requires FAA manufacturing inspection offices to disseminate this information to all FAA personnel or designees authorized to issue Form 8130-3 for the purpose of exporting PMA parts to Europe.

The FAA has signed Bilateral Aviation Safety Agreement (BASA) Implementation Procedures for Airworthiness (IPAs) with several civil aviation authorities in Europe. The BASA IPAs with France, Italy, Netherlands, Sweden, and the United Kingdom have specific provisions for the acceptance of U.S. PMA parts into those countries. In these five IPAs, paragraph 3.0.4.1 states that PMA parts will be directly accepted by these countries, without further technical validation, if (1) the PMA is not a critical part, or (2) the PMA part is produced under a licensing agreement with the original design approval holder. Paragraph 3.0.4.1 further states that Form 8130-3, Block 13, must contain one or both of the following statements, if applicable: (1) "This PMA part is not a critical component," and/or (2) "Produced under licensing agreement from the [TC or STC] holder."

When the PMA part is a critical part and has not been produced under a licensing agreement from the TC or STC holder, an explicit authorization from these civil aviation authorities is required before the PMA part will be accepted for use as a modification or replacement part. The explicit PMA authorization is essentially a technical validation effort, involving additional resources for both the PMA holder and the importing country's civil aviation authority. IPA paragraph 3.0.4.1 defines the procedures to follow when an explicit PMA authorization is required.

The DGAC of France has recently notified AIR-200 that almost all Form 8130-3 tags, issued for PMA parts being exported to France and other European countries, do NOT contain the statements in Block 13 (i.e., “This PMA part is not a critical component” and/or “Produced under licensing agreement from the [TC or STC] holder”). This includes PMA parts that are known to be non-critical parts produced under a licensing agreement. Consequently, most PMA parts exported to Europe are subject to the additional technical validation effort in accordance with the IPA. Unfortunately, most of these technical validations are unwarranted, and this situation is causing an undue burden for the DGAC and other European authorities. Therefore, it is imperative that all FAA personnel and designees prevent these unwarranted technical validations of PMA parts by ensuring that the applicable statements regarding the PMA part are entered in Block 13 of the Form 8130-3.

A revision to Order 8130.21, *Procedures for Completion and Use of the Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag*, will be issued in the future to provide detailed guidance on the completion of the Form 8130-3 with regard to exporting PMA parts to European bilateral countries. Until such time, FAA designees issuing the Form 8130-3 as an export document must be made aware that special importing requirements are found in both AC 21-2, *Export Airworthiness Approval Procedures*, and the BASA IPAs. The text of all BASA IPAs can be found on the Aircraft Certification Service International Aviation website: [http://www.faa.gov/certification/aircraft/BAA-BASA\\_Listing.stm](http://www.faa.gov/certification/aircraft/BAA-BASA_Listing.stm)

In order to prevent unwarranted technical validations of U.S. PMA parts, all manufacturing inspection offices are required to disseminate this memorandum to all FAA personnel and designees authorized to issue Form 8130-3 for the purpose of exporting PMA parts to Europe.

If there are any questions, please contact Ms. Tricia Stacey, Evaluations and International Programs Branch, AIR-230, at telephone number 202-267-8247.

*Original signed by Terry Allen for Frank P. Paskiewicz*

Frank P. Paskiewicz