

FAR Part 45, Subpart B - SO DIFFERENT TO CASR PART 21, SUBPART Q

IDENTIFICATION OF AIRCRAFT AND RELATED PRODUCTS

FAR Part 21, Subpart Q has been reviewed, amended and transferred to FAR Part 45, Subpart B so all aircraft markings are in the same Part. CASR PART 21, Subpart Q is now based on redundant FAA regulations that are different to the amended provisions in the FARs. Considering that these FAR changes were made in 2009, why does Australia continue to apply unique outdated requirements?

- Amendments were made to transfer markings to Part 45 and to align with global (EASA/TCA) standards to improve trade.

CASR Part 21, Subpart Q is no longer world best practice and it now applies unique red tape when compared to FAR requirements.

FAR Preamble states: *“PAHs must mark the product [aircraft, engine, propeller, etc.] they have been approved to produce. However, the sub-assemblies and component parts of that product or article **do not have to be marked or identified unless they leave the PAH’s facility as a separate article.** (e.g. replacement or modification part.) Methods include, but are not limited to, marking the article, attaching a tag to the article, placing the article in a container, or providing a document with the article with the information previously mentioned”.*

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<i>Global Standards</i>	<i>Redundant Standards</i>	<i>Adopt FAR</i>
Subpart B - Identification of Aircraft and Related Products	Subpart 21.Q Identification of aircraft and aeronautical products Division 21.Q.1 Preliminary	
<p>§ 45.10 Marking. No person may mark a product or article in accordance with this subpart unless—</p> <p>(a) That person produced the product or article —</p> <p style="margin-left: 20px;">(1) Under part 21, subpart F, G, K, or O of this chapter; or</p> <p style="margin-left: 20px;">(2) For export to the United States under the provisions of an agreement between the United States and another country or jurisdiction for the acceptance of products and articles; and</p> <p>(b) That product or article conforms to its approved design, and is in a condition for safe operation; and, for a TSO article; that TSO article meets the applicable performance standards.</p>	<p>21.805 Applicability of this Subpart This Subpart applies to an aircraft, aircraft engine, aircraft propeller, critical part or other aircraft part manufactured after this Subpart commences.</p>	<p>Applicability now different because of changes made to FAR Part 21 in 2009. Adopt FAR.</p>
	<p>21.810 Meaning of fireproof</p> <p>(1) A reference in this Subpart to a fireproof manufacturer’s data plate is a reference to a data plate that:</p> <p style="margin-left: 20px;">(a) is made of material that withstands the heat of a fire at least as well as a steel plate of the same size and thickness; and</p> <p style="margin-left: 20px;">(b) on which the details that it is required to bear are legibly marked by a fireproof method.</p> <p>(2) In this Subpart: fireproof method of marking means marking by:</p>	<p>FAR no longer refers to “fireproof”. Included in FAR 45.11 Repeal & Adopt FAR</p>

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	(a) etching, stamping or engraving; or (b) another similar method of marking approved for a particular purpose.	
<p>FAR 45.11 – General</p> <p>(a) Aircraft and aircraft engines. Aircraft covered under §21.182 of this chapter must be identified, and each person who manufactures an aircraft engine under a type or production certificate shall identify that engine, by means of a fireproof plate that has the information specified in §45.13 of this part <u>marked on it by etching, stamping, engraving, or other approved method of fireproof marking</u>. The identification plate for aircraft must be secured in such a manner that it will not likely be defaced or removed during normal service, or lost or destroyed in an accident. Except as provided in paragraphs (c), (d), and (e) of this section, the aircraft identification plate must be secured to the aircraft fuselage exterior so that it is legible to a person on the ground, and must be either adjacent to and aft of the rear-most entrance door or on the fuselage surface near the tail surfaces. For aircraft engines, the identification plate must be affixed to the engine at an accessible location in such a manner that it will not likely be defaced or removed during normal service, or lost or destroyed in an accident.</p> <p>(b) Propellers and propeller blades and hubs. Each person who manufactures a propeller, propeller blade, or propeller hub under the terms of a type or production certificate shall identify his product by means of a plate, stamping, engraving, etching, or other approved method of fireproof identification that is placed on it on a noncritical surface, contains the information specified in §45.13, and will not be likely to be defaced or removed during normal service or lost or destroyed in an accident.</p> <p>(c) For manned free balloons, the identification plate prescribed in paragraph (a) of this section must be secured to the balloon envelope and must be located, if practicable, where it is legible to the operator when the balloon is inflated. In addition, the basket and heater assembly must be permanently and legibly marked with the manufacturer's name, part number (or equivalent) and serial number (or equivalent).</p> <p>(d) On aircraft manufactured before March 7, 1988, the identification plate required by paragraph (a) of this section may be secured at an accessible exterior or interior location near an entrance, if the model designation and builder's serial number are also displayed on the aircraft fuselage exterior. The model designation and builder's serial number must be legible to a person on the ground and must be located either, adjacent to and aft of the rear-most entrance door, or on the fuselage near the tail surfaces. The model designation and builder's serial number must be displayed in such a manner that they are not likely to be defaced or removed during normal</p>	<p>Division 21.Q.2 Aircraft, aircraft engines and aircraft propellers</p> <p>21.815 Applicability of this Division This Division applies to an aircraft (or an aircraft engine or aircraft propeller) manufactured after this Subpart commences.</p> <p>21.820 Manufacturer's data plate must be attached to aircraft</p> <p>(1) This regulation sets out the requirements for attaching a manufacturer's data plate to an aircraft to which this Division applies.</p> <p>(2) The manufacturer of an aircraft to which this Division applies must attach to it, as set out in subregulations (3) and (4), a fireproof manufacturer's data plate bearing the following information:</p> <p>(a) the name of the manufacturer;</p> <p>(b) the identification number of the aircraft's type certificate (if any);</p> <p>(c) the identification number of the production certificate (if any) under which the aircraft is manufactured;</p> <p>(d) the aircraft's model designation;</p> <p>(e) the aircraft's serial number.</p> <p>Penalty: 20 penalty units.</p> <p>(2A) An offence against subregulation (2) is an offence of strict liability. <i>Note For strict liability, see section 6.1 of the Criminal Code.</i></p> <p>(3) The data plate must be attached in a way that ensures that it is not likely to be defaced or removed during normal service, nor lost or destroyed in an accident.</p> <p>(4) The data plate must be attached:</p> <p>(a) to a manned free balloon — to the lower section of the balloon's envelope in a place where the operator can read it when the balloon is inflated; or</p> <p>(b) to a glider — in a visible place inside the cockpit; or</p> <p>(c) to any other aircraft — in a place where it is clearly legible:</p> <p>(i) on the frame of the aircraft's rearmost entrance; or</p> <p>(ii) near, but aft of, the aircraft's rearmost entrance; or</p> <p>(iii) on the aircraft's fuselage near its tail.</p> <p><i>Note For the definition of aircraft see section 3 of the Act. For the definitions of identification number, manned free balloon, production certificate and type certificate see the Dictionary.</i></p> <p>21.835 Manufacturer's data plate must be attached to aircraft engine</p> <p>(1) This regulation sets out the requirements for attaching a manufacturer's data plate to an aircraft engine to which this Division applies.</p>	<p>Adopt FARs</p> <p>Reference to "fireproof" has been replaced by "not likely to be lost or destroyed in an accident".</p> <p>What needs to on identification plates are in FAR 45.13</p> <p>Changes match global practice.</p>

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<p>service.</p> <p>(e) For powered parachutes and weight-shift-control aircraft, the identification plate prescribed in paragraph (a) of this section must be secured to the aircraft fuselage exterior so that it is legible to a person on the ground.</p>	<p>(2) This regulation applies to the holder of the type certificate or production certificate under which such an aircraft engine is manufactured.</p> <p>(3) The holder of the type certificate or production certificate must attach to the engine, as set out in subregulation (4), a fireproof manufacturer's data plate bearing the following information:</p> <p>(a) the manufacturer's name;</p> <p>(b) the identification number of the engine's type certificate (if any);</p> <p>(c) the identification number of the production certificate (if any) under which the engine is manufactured;</p> <p>(d) the engine's model designation;</p> <p>(e) its serial number;</p> <p>(f) if its rating is stated in its type certificate, that rating.</p> <p>Penalty: 20 penalty units.</p> <p>(3A) An offence against subregulation (3) is an offence of strict liability.</p> <p><i>Note For strict liability, see section 6.1 of the Criminal Code.</i></p> <p>(4) The data plate must be attached to the engine:</p> <p>(a) in a place where somebody carrying out maintenance on the engine can read it; and</p> <p>(b) in a way that ensures that the plate is not likely to be defaced or become detached from the engine during normal service, nor to be lost or destroyed in an accident.</p> <p><i>Note For the definitions of identification number, production certificate and type certificate see the Dictionary.</i></p>	
<p>FAR 45.13 - Identification Data</p> <p>(a) The identification required by §45.11 (a) and (b) shall include the following information:</p> <p>(1) Builder's name.</p> <p>(2) Model designation.</p> <p>(3) Builder's serial number.</p> <p>(4) Type certificate number, if any.</p> <p>(5) Production certificate number, if any.</p> <p>(6) For aircraft engines, the established rating.</p> <p>(7) On or after January 1, 1984, for aircraft engines specified in part 34 of this chapter, the date of manufacture as defined in §34.1 of that part, and a designation, approved by the Administrator of the FAA, that indicates compliance with the applicable exhaust emission provisions of part 34 and 40 CFR part 87. Approved designations include COMPLY, EXEMPT, and NON-US as appropriate.</p> <p>(i) The designation COMPLY indicates that the engine is in compliance with all of the applicable exhaust emissions provisions of part 34. For any engine with a rated thrust in excess of 26.7 kilo newtons (6000 pounds) which is not used or intended for use in commercial operations and which is in compliance with the applicable provisions of part 34, but does not comply with the hydrocarbon emissions standard of §34.21(d), the statement "May not be used as a commercial aircraft engine" must be noted in the permanent powerplant record that accompanies the engine at the time of manufacture of the engine.</p> <p>(ii) The designation EXEMPT indicates that the engine has been granted an exemption pursuant to the applicable provision of §34.7 (a)(1), (a)(4), (b), (c), or (d), and an indication of the type of exemption and the reason for the grant must be noted in the permanent powerplant record that accompanies the engine from the time of manufacture of the engine.</p> <p>(iii) The designation NON-US indicates that the engine has been granted an exemption pursuant to §34.7(a)(1), and the notation "This aircraft may not be operated within the United States", or an equivalent notation approved by the Administrator of the FAA,</p>	<p>21.840 Aircraft propellers, blades and hubs must carry identification marks</p> <p>(1) This regulation sets out the requirements to mark information on, or attach a manufacturer's data plate to, an aircraft propeller, propeller blade or propeller hub to which this Division applies.</p> <p>(2) The holder of the type certificate or production certificate under which such a propeller, blade or hub is manufactured must:</p> <p>(a) legibly mark on it by a fireproof method, as set out in subregulation (3), the information mentioned in subregulation (5); or</p> <p>(b) attach to it, as set out in subregulation (4), a manufacturer's data plate on which that information is legibly marked by a fireproof method.</p> <p>Penalty: 20 penalty units.</p> <p>(2A) An offence against subregulation (2) is an offence of strict liability.</p> <p><i>Note For strict liability, see section 6.1 of the Criminal Code.</i></p> <p>(3) If information is marked on a propeller, blade or hub, it must be marked in a way that ensures that it is not likely to be defaced.</p> <p>(4) If a manufacturer's data plate is attached to a propeller, blade or hub, the plate must be attached to a non-critical surface in a way that ensures that the plate is not likely to be defaced or become detached during normal</p>	<p>Has added production certificate number</p> <p>FAR Part 21 review deleted all reference to Class I & II products to align with world standards.</p>

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<p>must be inserted in the aircraft logbook, or alternate equivalent document, at the time of installation of the engine.</p> <p>(8) Any other information the Administrator finds appropriate.</p> <p>(b) Except as provided in paragraph (d)(1) of this section, no person may remove, change, or place identification information required by paragraph (a) of this section, on any aircraft, aircraft engine, propeller, propeller blade, or propeller hub, without the approval of the Administrator.</p> <p>(c) Except as provided in paragraph (d)(2) of this section, no person may remove or install any identification plate required by §45.11 of this part, without the approval of the Administrator.</p> <p>(d) Persons performing work under the provisions of Part 43 of this chapter may, in accordance with methods, techniques, and practices acceptable to the Administrator—</p> <p>(1) Remove, change, or place the identification information required by paragraph (a) of this section on any aircraft, aircraft engine, propeller, propeller blade, or propeller hub; or</p> <p>(2) Remove an identification plate required by §45.11 when necessary during maintenance operations.</p> <p>(e) No person may install an identification plate removed in accordance with paragraph (d)(2) of this section on any aircraft, aircraft engine, propeller, propeller blade, or propeller hub other than the one from which it was removed</p>	<p>service, nor lost in an accident.</p> <p>(5) The information is:</p> <p>(a) the manufacturer's name; and</p> <p>(b) the identification number of the type certificate (if any) of the propeller; and</p> <p>(c) the identification number of the production certificate (if any) under which the propeller is manufactured; and</p> <p>(d) the model designation of the propeller, blade or hub; and</p> <p>(e) its serial number.</p> <p><i>Note For the definitions of identification number, production certificate and type certificate see the Dictionary.</i></p> <p>21.825 Manufacturer's data plate must be attached to basket of manned free balloon</p> <p>(1) This regulation sets out an additional requirement for attaching a manufacturer's data plate to the basket of a manned free balloon to which this Division applies.</p> <p>(2) This regulation applies to the holder of the type certificate or production certificate under which such a balloon is manufactured.</p> <p>(3) The holder of the type certificate must attach to the basket of the balloon, as set out in subregulation (4), a heat-resistant metal plate on which the following information is legibly marked by a fireproof method:</p> <p>(a) the name of the manufacturer;</p> <p>(d) the basket's part number;</p> <p>(e) the basket's serial number.</p> <p>Penalty: 20 penalty units.</p> <p>(3A) An offence against subregulation (3) is an offence of strict liability.</p> <p><i>Note For strict liability, see section 6.1 of the Criminal Code.</i></p> <p>(4) The manufacturer's data plate must be attached to the basket in a way that ensures that the plate is not likely to be defaced or removed during normal service, nor to be lost or destroyed in an accident.</p> <p><i>Note For the definitions of manned free balloon, production certificate and type certificate see the Dictionary.</i></p> <p>21.830 Heater assembly of manned free balloon must carry identification mark</p> <p>(1) This regulation applies to a manned free balloon to which this Division applies that has a heater assembly.</p> <p>(2) The holder of the type certificate or production certificate under which the balloon is manufactured must, as set out in subregulation (3), also mark on the heater assembly, by a fireproof method, the information mentioned in subregulation (4).</p> <p>Penalty: 20 penalty units.</p>	

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	<p>(2A) An offence against subregulation (2) is an offence of strict liability. <i>Note</i> For strict liability, see section 6.1 of the <i>Criminal Code</i>.</p> <p>(3) The information must be marked in a way that ensures that it is not likely to be defaced.</p> <p>(4) The information is: (a) the name of the heater’s manufacturer; and (b) its part number; and (c) its serial number.</p> <p><i>Note</i> For the definitions of manned free balloon, production certificate and type certificate see the Dictionary.</p> <p>21.875 Identification of other aircraft parts</p> <p>(1) Subject to regulation 21.880, the manufacturer of a part or product mentioned in paragraphs 21.860 (b) or (c) must legibly and permanently mark on each of those parts or products produced, as set out in subregulation (3), the following information: (a) the trade mark of or name of the manufacturer; (b) the part number of the part or product.</p> <p>Penalty: 20 penalty units.</p> <p>(2) An offence against subregulation (1) is an offence of strict liability.</p> <p>(3) The information must be marked in a way that ensures that it is not likely to be defaced.</p> <p>21.880 Identification of other aircraft parts — other than by marking</p> <p>(1) Subregulation (2) applies to a part or product to which regulation 21.875 applies if, because of the shape, size or nature of the part or product, it is impracticable to mark on the part or product the information required by regulation 21.875.</p> <p>(2) If this subregulation applies to a part or product, the manufacturer of the part or product need not comply with regulation 21.875.</p> <p>(3) The manufacturer of a Class II or Class III product referred to in paragraph 21.860 (c) must include the information required by paragraphs 21.875 (1) (a) and (b) in the authorised release certificate supplied with the product or the container of the product.</p>	
<p>FAR 45.14 - Identification of Critical Components</p> <p>Each person who produces a part for which a replacement time, inspection interval, or related procedure is specified in the Airworthiness Limitations section of a manufacturer's maintenance manual or Instructions for Continued Airworthiness <u>shall permanently and legibly mark that component with a part number (or equivalent) and a serial number (or equivalent).</u></p>	<p>Division 21.Q.3 Critical parts</p> <p>21.845 Applicability of this Division This Division applies to a critical part manufactured on or after 1 October 2000.</p> <p>21.850 Identification of critical parts</p> <p>(1) This regulation applies to a person who manufactures, in Australia, a</p>	<p>Adopt FAR</p> <p>FAR now clarifies that, regulatory wise, it only applies to items listed in the Airworthiness</p>

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	<p>critical part to which this Division applies.</p> <p>(2) The person must legibly and permanently mark on the part, as set out in subregulation (3), the following information:</p> <p>(a) the part's part number;</p> <p>(b) its serial number.</p> <p>Penalty: 20 penalty units.</p> <p>(2A) An offence against subregulation (2) is an offence of strict liability. <i>Note For strict liability, see section 6.1 of the Criminal Code.</i></p> <p>(3) The information must be marked in a way that ensures that it is not likely to be defaced.</p> <p>21.855 Removal or alteration of identification on critical parts</p> <p>(1) Except with CASA's written approval, a person must not engage in conduct that results in the removal or alteration of any of the information marked, in accordance with this Division, on a critical part to which this Division applies.</p> <p>Penalty: 20 penalty units.</p> <p>(1A) An offence against subregulation (1) is an offence of strict liability. <i>Note For strict liability, see section 6.1 of the Criminal Code.</i></p> <p>(2) CASA must not grant an approval under subregulation (1) if the granting of the approval would adversely affect the safety of air navigation.</p>	<p>Limitations section of the Manual</p> <p>21.855 not in FAR</p>
<p>FAR 45.15 - Replacement and Modification Parts</p> <p>(a) Except as provided in paragraph (b) of this section, each person who produces a replacement or modification part under a Parts Manufacturer Approval issued under §21.303 of this chapter shall permanently and legibly mark the part with—</p> <p>(1) The letters "FAA-PMA";</p> <p>(2) The name, trademark, or symbol of the holder of the Parts Manufacturer Approval;</p> <p>(3) The part number; and</p> <p>(4) The name and model designation of each type certificated product on which the part is eligible for installation.</p> <p>(b) If the Administrator finds that a part is too small or that it is otherwise impractical to mark a part with any of the information required by paragraph (a) of this section, a tag attached to the part or its container must include the information that could not be marked on the part. If the marking required by paragraph (a)(4) of this section is so extensive that to mark it on a tag is impractical, the tag attached to the part or the container may refer to a specific readily available manual or catalogue for part eligibility information.</p>	<p>Division 21.Q.4 Aircraft parts</p> <p>21.860 Applicability of this Division</p> <p>This Division applies to:</p> <p>(a) an aircraft part produced under an APMA, on or after 1 October 2000; and</p> <p>(b) a modification or replacement part referred to in paragraph 21.303 (2) (a) or (c) and produced after 30 November 2003; and</p> <p>(c) a Class II or Class III product produced under a production certificate that is referred to in regulation 21.133 (2A) or (2B).</p> <p><i>Note For the definition of APMA see the Dictionary.</i></p> <p>21.865 Identification of parts produced under an APMA</p> <p>(1) Subregulation (2) applies to the holder of the APMA under which a part to which this Division applies is manufactured.</p> <p>(2) Subject to regulation 21.870, the holder of the APMA must legibly and permanently mark on the part, as set out in subregulation (3), the information required by subregulation (4).</p> <p>Penalty: 20 penalty units.</p> <p>(2A) An offence against subregulation (2) is an offence of strict liability. <i>Note For strict liability, see section 6.1 of the Criminal Code.</i></p>	<p>Adopt FAR</p> <p>Class I & II products no longer available outside Australia.</p> <p>Redundant terminology.</p> <p>No longer current with world's practice.</p> <p>Over-prescriptive adding unnecessary costs for no safety benefit.</p>

