

SIDE MEETING #10

Part-21 light / MOSAIC

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Part-21 light / MOSAIC

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- Term of Reference
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MOSAIC

Modernization of Special Airworthiness Certification

MOSAIC is a change process that modernised the US regulatory framework of Light Sport Aircraft and introduced **14 CFR Part-22**

Part-21 light

Annex 1b of Regulation (EU) No 748/2012

Today we mainly refer to the Declared Process i.a.w. Subpart C

For the purpose of todays discussion, if not mentioned otherwise, we talk about manned aeroplane and the propulsion systems thereof.

Comparison

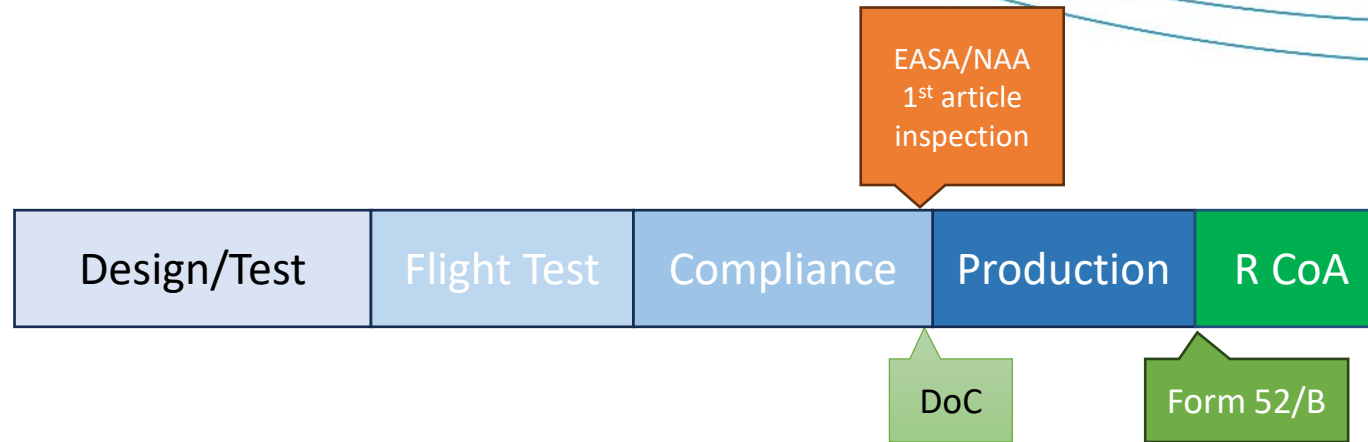
	Part-21 light - Declared	14 CFR Part-22
Scope - Aeroplane	MTOM 1200 kg not jet-powered Max two seats	No weight limit Min speed 61 knots (Landing configuration) Max speed 250 knots Max four seats ----- Sport Pilot Min speed 59 knots (clean) Max two occupants incl. pilot
Airworthiness req.	As per Detailed Technical Specifications (DS-21LD) CS-23 Amdt. 6 with AMC 1 CS-LSA Amdt. 1	Requirements of Part-22 using a means of compliance consisting of consensus standards accepted or approved by the FAA.
Engine/Prop with TC	Engine with EASA Type Certificate*	---
Engine/Prop as part of aeroplane	CS-E/P, CS-22 H/J*, CS-LSA (engine part)*	Requirements of Part-22 using a means of compliance consisting of consensus standards accepted or approved by the FAA.

*within weight category

	Part-21 light - Declared	14 CFR Part-22
Authority Involvement	First article inspection	Inspected by the FAA and found to be in a condition for safe operation.
Design QA	Process described in Part-21 L – Subpart C	22.185 Quality assurance system (defined MoC by FAA)
Production QA	Declared Production Org. (DPO) or Approved PO (POA)	
Declaration	Declaration of Design compliance Including noise, ICAO Annex 16	Statement of Compliance (Design, production, conformity) by person certified and trained acceptable to FAA
Approval	No Approval Declaration of Design Compliance For Aircraft Design	No Approval Statement of Compliance (per serial)
EASA publication	EASA will publish for which Aircraft Design it has registered an Declaration	
Production	Form 52/B as Certificate of Conformity	
C of A	Restricted Certificate of Airworthiness	Special C of A for LSA

Part-21L vs. US Part-22

Part-21L



US Part-22



Changes / Alterations

Part-21L: Only the Declarant may declare compliance for a major change

US Part 22: Each major alteration must be authorised by the manufacturer

Import to the US

For aircraft manufactured outside the United States, an applicant must **also** provide the FAA evidence that:

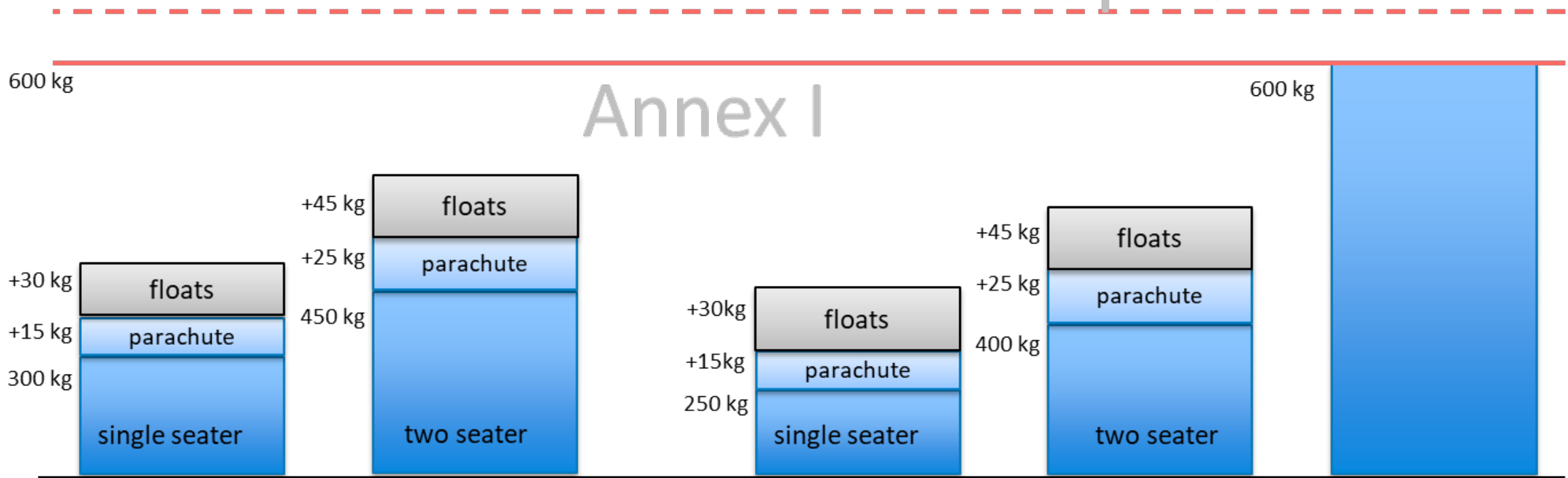
- (1) The aircraft was manufactured in a country with which the United States has a Bilateral Airworthiness Agreement concerning airplanes or Bilateral Aviation Safety Agreement with associated Implementation Procedures for Airworthiness concerning airplanes, or an equivalent airworthiness agreement; and
- (2) The aircraft is *eligible* for an airworthiness certificate, flight authorization, or other similar certification *in its country of manufacture*.

EASA support for Export of LSA

BR 2018/1139 2(4) (d) - Annex I and BR 2(8) - Opt-out

+50kg seaplane

Opt-Out



Annex I - (e) Aeroplane, Helicopter, Powered Parachutes, powered sailplanes

sailplanes

(f) gyrocopter

1. Allow development and flight test
2. Enable export once flight test completed

Ad 1: Flight Conditions purpose 1 and 2

21.A.701 Scope

Regulation (EU) 2025/1065

- (a) Permits to fly shall be issued in accordance with this Subpart to aircraft that do not meet, or have not been shown to meet, applicable airworthiness requirements but are capable of safe flight under defined conditions and for the following purposes:
1. development;
 2. showing compliance with regulations or certification specifications;

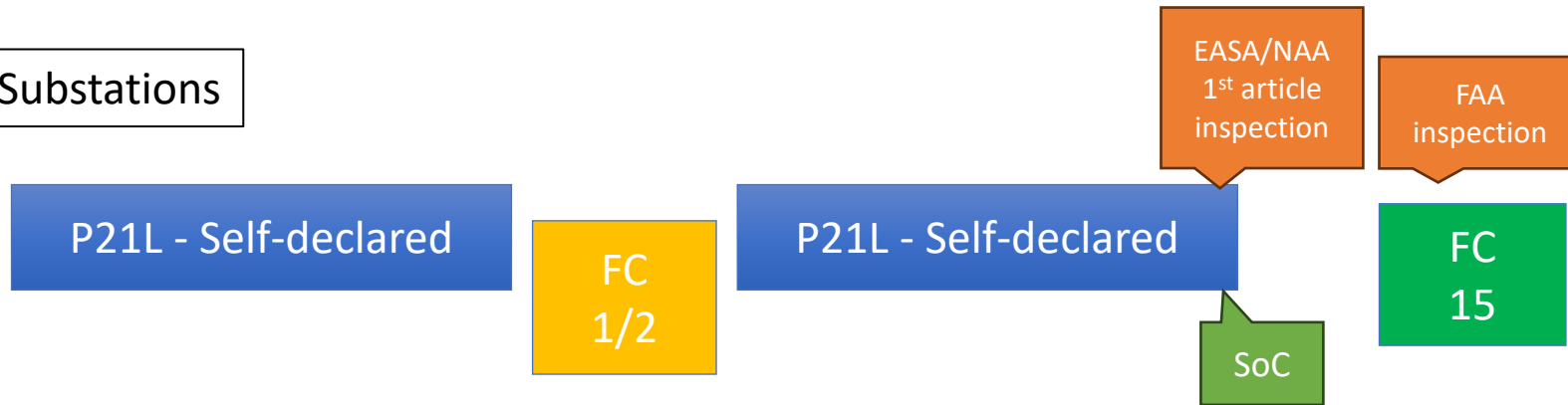
- Ad 2:
- (15) For non-commercial flying activity on individual non-complex aircraft or types for which a certificate of airworthiness or restricted certificate of airworthiness is not appropriate.
- For aircraft which cannot practically meet all applicable certification specifications, such as certain aircraft without TC-holder ('generically termed orphan aircraft') or aircraft which have been under national systems of Permit to Fly and have not been demonstrated to meet all applicable requirements. The option of a permit to fly for such an aircraft should only be used if a certificate of airworthiness or restricted certificate of airworthiness cannot be issued due to conditions which are outside the direct control of the aircraft owner, such as the absence of properly certified spare parts.

How to substantiate the Flight Conditions?

- Use of Part-21 light – Subpart C principles for both applicant and EASA
- Airworthiness Requirements: 14 CFR Part 22 + FAA accepted MoC

From 18b:

7. Substations



For purpose 15:

8. Conditions/Restrictions:

The FC are issued to support the aircraft registration in the US Special Category (LSA)

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Looking forward to a fruitful discussion!

Part-21 light

Part-21 light is hardly used – Reasons?

Thank you for your participation!

Post-event

Fees & Charges

http://data.europa.eu/eli/reg_impl/2025/2347/oj

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9. Provisions for the implementation of Annex Ib (Part 21 Light) to Regulation (EU) No 748/2012:

For Part 21 Light Certified process:

- In Part I, Tables 1, 2 and 3, of this Annex, if an application falls under Part 21 Light Certified, the corresponding fees shall apply.
- In Part I, Table 4, of this Annex, if an application falls under Part 21 Light Certified, the corresponding fee decreased by 50 % shall apply.
- In Part I, Table 8, of this Annex, the applicable fee category shall be determined by the fee category assigned to the related type design. In the case of aircraft defined as 'Gyroplanes', the corresponding fee decreased by 50 % shall apply.

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For Part 21 Light Declared process:

- In Part I, Table 1, of this Annex, if an application is made for Declaration of Design Compliance, the corresponding fee decreased by 50 % shall apply.
- In Part I, Table 3, of this Annex, if an application falls under Part 21 Light Declared process, the corresponding fee decreased by 50 % shall apply.
- In Part I, Table 8, of this Annex, the applicable fee category shall be determined by the fee category assigned to the declaration of aircraft design compliance.

For Declared Design Organisations:

- In Part I, Table 9A, of this Annex, Surveillance fee, for Declared Design Organisations, the corresponding fee decreased by 50 % shall apply.

For Declared Production Organisations:

- In Part I, Table 10, of this Annex, for Declared Production Organisations, the corresponding approval and surveillance fees shall apply.