

Guide On AERONAUTICAL PRODUCTS IMPORT

Revision 2



GUIDE ON AERONAUTICAL PRODUCTS IMPORT – REVISION 2

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1. INTRODUCTION

This import guide aims to support importers, customs brokers, aircraft operators and maintenance organizations in activities related to the import of civil aeronautical products and their subsequent use in Brazil. It contains definitions for types of aeronautical products and articles, as well as main documents required for the entry in Brazil of each type of product.

When applicable, the import of products must follow the provisions of the international agreements in force between Brazil and the exporting country, which may contain additional restrictions on the import of a certain products to be observed before carrying out that transaction.

The import of aeronautical products whose usage is prohibited in Brazil will subject the importer to the sanctions existent in the legislation in force. Therefore, it is recommended to observe the provisions contained in section 6 of this guide.

This guide is an informative document and does not replace the applicable legislation in force, notably the requirements contained in RBAC 21 and the acceptable means of compliance contained in Supplementary Instruction (IS) No. 21-010, regarding the procedures for the approval of foreign civil aeronautical products and import of any civil aeronautical products.

Likewise, the required documentation presented in this guide is not extensive, whose complete listing will depend on the type and size of the imported aeronautical product.

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3. DEFINITIONS

Aeronautical product: An aircraft, engine or propeller, and its components.

Amateur-built aircraft: According to paragraph 21.191(g)-l of RBAC 21, it is an aircraft whose major portion was built by persons who undertook the construction project solely for their own education or recreation.

Appliance: means any instrument, mechanism, equipment, part, apparatus, appurtenance, or accessory, including communications equipment, that is used or intended to be used in operating or controlling an aircraft in flight, is installed in or attached to the aircraft, and is not part of an airframe, engine, or propeller.

Article: means a material, part, component, process, or appliance.

Commercial part: means an article that is listed in the Commercial Parts List approved by ANAC or by the Civil Aviation Authority from the State of Design, included in a design approval holder's instructions for continued airworthiness in accordance with section 21.50 of RBAC 21 or equivalent requirement in the State of Design.

Light-sport aircraft: means an aircraft, other than a helicopter or powered-lift that, since its original certification, has continued to meet the characteristics defined in RBAC 01.

Standard part: A part manufactured in accordance with an established governmental or industry accepted specification, which includes design, manufacturing, and identification requirements. The specification must include all information necessary to produce in series the part. The specification must be published so that any party may manufacture the part. Examples include, but are not limited to, National Aerospace Standard (NAS), Air Force/Navy (AN) Aeronautical Standard, Society of Automotive Engineers (SAE), Aerospace Standard (AS), Military Standard (MS), etc.

State of Design: means the country or union of countries having regulatory authority over the organization responsible for the design and continued airworthiness of a product or an article used in civil aviation.

New and used aeronautical products: are defined as per table below:

<p>New aircraft</p> <p>An aircraft is new while it is still owned by the manufacturer, distributor, or dealer, or their trustee, if there is no intervening private owner, lease, or time sharing arrangement, and the aircraft has not been used in any pilot school and/or other commercial operation.</p> <p><i>Exemples:</i></p> <ul style="list-style-type: none"> • Newly-built aircraft, having total operating time related to test and production flights. • Aircraft operated by the manufacturer as a demonstrator or prototype, without having been registered to a third party. 	<p>Used aircraft</p> <p>Any aircraft which is not new.</p> <p><i>Exemples:</i></p> <ul style="list-style-type: none"> • Aircraft registered to an operator other than the manufacturer, distributor, dealer, or its administrator, regardless of the total number of hours flown in that situation or even if it has not been used. • Aircraft repaired after an accident or that underwent a general overhaul.
<p>New engine, propeller and parts</p> <p>A product other than an aircraft is new while it does not have any time in service in an aircraft.</p> <p><i>Exemples:</i></p> <ul style="list-style-type: none"> • Newly-built engines with bench testing total time, but no usage time in aircraft. • Newly-built parts which have never been installed. 	<p>Used engine, propeller and parts</p> <p>Any engine, propeller or parts that are not new.</p> <p><i>Exemples:</i></p> <ul style="list-style-type: none"> • Engines installed in aircraft, even if the aircraft is considered new • Engines rebuilt by the manufacturer • Retreaded tyres • Parts underwent to overhaul

Validation: the process performed by ANAC to issue its own certificate, equivalent to the original type certificate (or supplemental type certificate), in order to find compliance with Brazilian airworthiness and environmental protection requirements.

4. LEGAL BASIS

The Brazilian National Civil Aviation Agency (ANAC) was created by Law No. 11182, dated September 27, 2005, and regulated by Decree No 5731, dated March 20, 2006, and has as one of its powers to regulate and supervise civil aviation activities and their aeronautical and airport infrastructures.

Sections 21.183, 21.184, 21.185, 21.500 and 21.502 of RBAC 21 establish that each product exported to Brazil must be accompanied by an export airworthiness approval (export airworthiness certificate, authorized release certificate or equivalent documents).

The export airworthiness approval must follow the provisions of the international agreements in force between Brazil and the exporting country (or union of countries).

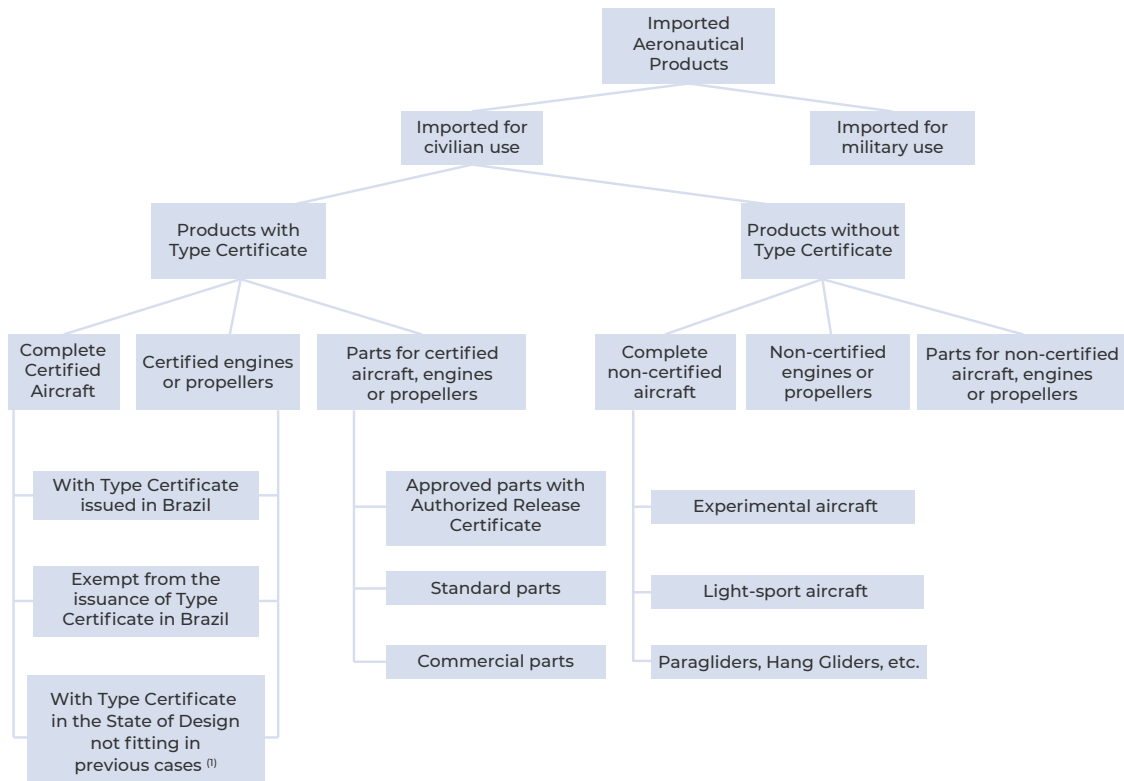
Supplementary Instruction (IS) No. 21-010 ("Procedures for the approval of foreign civil aeronautical products and the importation of any civil aeronautical products"), issued by ANAC, details the requirements applicable to the import of aeronautical products, highlight given to sections 5.10, on airworthiness approval for export to Brazil, and 5.11, on customs aspects of importing aeronautical products.

The Foreign Trade Secretariat of the Ministry of Development, Industry, Trade and Services (SECEX) established rules for imports licensing in Ordinance No. 249, of July 4th, 2023. According to article 29 of that ordinance and its §5th, item I, and § 7th, the import of used goods to Brazil is subject to licensing. However, such licensing is not required for aeronautical products, provided that ANAC requirements are complied with whenever those products are bound for civilian use.

5. CLASSIFICATION OF AERONAUTICAL PRODUCTS

5.1 PRODUCTS AND PARTS CLASSIFICATION TREE

For the purposes of this guide, the following aeronautical product classification structure is used:



Note⁽¹⁾: Refer to item 5.2.3 for the conditions for issuing an Export Certificate of Airworthiness in this case.

5.2 AERONAUTICAL PRODUCTS WITH TYPE CERTIFICATE

5.2.1 WHAT ARE CERTIFIED AERONAUTICAL PRODUCTS?

Aircraft, engines or propellers that received a type certificate in Brazil or in the project country are considered certified products. Parts for aircraft, engines and propellers with a type certificate are also certified products, including modification parts.

Note: The term “certified aircraft” may not be used to describe an aircraft without type certification which has only received a special certificate of airworthiness, for example, in the case of light-sport or experimental aircraft.

5.2.2 WHAT ARE AERONAUTICAL PRODUCTS EXEMPT FROM TYPE CERTIFICATE IN BRAZIL?

Aircraft, engines and propellers exempt from type certificate in Brazil are those that fall under the provisions of paragraph 21.29(d)-I or 21.29(e)-I of RBAC 21. Such exemptions are related to products used in Brazil before the Brazilian Aeronautical Code (Law No. 7565/1986) entered into force, or that have been considered similar to these products.

Note: products exempt from a type certificate in Brazil fall into the “certified aircraft” category, that is, they are products that have a type certificate in the State of Design but are exempt from a Brazilian type certificate.

5.2.3 HOW TO IDENTIFY IF AN AIRCRAFT, ENGINE OR PROPELLER HAS A TYPE CERTIFICATE?

Given that the import of certified products requires the fulfillment of several additional requirements, it is strongly recommended that importers verify if products to be imported are certified and if they comply with all applicable requirements prior to their purchase abroad.

The following steps allow you to identify whether or not the product is certified:

Check identification plate or markings

In case the aircraft, engine or propeller has in its physical identification (plate, decal, etc.) a reference to a type certificate (TC – *Type Certificate*, TCDS – *Type Certificate Data Sheet*, etc.), the product is certified.

If there are no such markings, the product can still be certified – follow next steps.

Check on the ANAC website if the aircraft, engine or propeller has a Type Certificate issued in Brazil or if it is exempt from type certification in Brazil

The type certificates issued by ANAC can be verified at <https://sistemas.anac.gov.br/certificacao/Produtos/EspecificacaoE.asp>

The list of products exempt from Type Certificate in Brazil can be checked at <https://sistemas.anac.gov.br/certificacao/Produtos/IsentosE.asp>

Note: The original Type Certificate holder may have had its name changed name or may have transferred the certificate to another company. If the searched model does not appear for the CT holder that is on the identification plate, consult the companies listed in the footer in “See Also”.

If the product model is not included either in the list of products with a type certificate issued by ANAC or in the list of products exempt from type certification in Brazil, it can still be certified – follow the next steps.

Check if there is a type certificate issued by the country of design

Based on the identification plate, consultation to the manufacturer, internet research, etc., identify which is the State of Design for the aircraft, engine or propeller.

Note: In some cases, the aircraft, engine or propeller may have been manufactured in a country other than the country of the type design holder.

Knowing the State of Design, consult the Civil Aviation Authority of the country responsible for that product to find out if a type certificate has been issued. The following list made available by ANAC may be used as a reference:

- Type Certificates and Type Certificate Data Sheets - <https://www.gov.br/anac/pt-br/centrais-deconteudo/biblioteca/certificados-e-especificacoes-de-tipo> (Portuguese Only)
- Aviation Authorities websites - <https://www.gov.br/anac/pt-br/centrais-deconteudo/biblioteca/websites-de-autoridades> (Portuguese Only)

Notes:

The European Union Aviation Safety Agency (EASA) is the civil aviation authority responsible for type certification in the European Union and in Switzerland, Norway, Iceland and Liechtenstein. If a certain model is not found on the EASA website, also consult the civil aviation authority of the design country, especially in the case of older models.

Considering the withdrawal of the United Kingdom from the European Union (Brexit), if the State of Design is the United Kingdom, consult both the EASA and the UK Civil Aviation Authority (CAA-UK) websites

If there are still doubts, consult the manufacturer of the aircraft, engine or propeller, or make a specific inquiry to ANAC at https://www.gov.br/anac/en/service_channels/contact-us.

After the assessment above, the aircraft, engine or propeller will fall under one of the following groups:

- Certified product with a type certificate issued in Brazil
- Certified product list as exempt from type certification in Brazil
- Certified product in the State of Design, not having a Brazilian type certificate and no being exempt from Brazilian type certification

WARNING: products in this group can only receive an Export Certificate of Airworthiness upon an exception accepted by ANAC prior to the import – see section 8 of this Guide.

- Non-certified product (a product which does not have a type certificate in the State of Design)

5.2.4 WHAT ARE THE DIFFERENCES BETWEEN TYPE CERTIFICATE, CERTIFICATE OF AIRWORTHINESS AND EXPORT CERTIFICATE OF AIRWORTHINESS?

TYPE (KIND) OF CERTIFICATE	TYPE CERTIFICATE (TC)	CERTIFICATE OF AIRWORTHINESS (C-of-A)	EXPORT CERTIFICATE OF AIRWORTHINESS (EXPORT C-of-A)
Purpose	Certify that the aircraft model complies with applicable set of requirements	Certify that a specific aircraft serial number conforms to the type certificate (if any) and is in condition for safe operation	Certify that the aircraft conforms to the type design of the import country, meets the special requirements of that country and is in condition for safe operation.
Who issues it?	Civil Aviation Authority (CAA) of the State of Design (primary authority) ANAC when validating a foreign TC	ANAC in case of aircraft to be operated in Brazil	Exporting country CAA or designated/ authorized person by that CAA
Holder	Design owner (manufacturer)	Aircraft operator	Aircraft owner
Required for aircraft operation?	Not directly, but required for the issuance of the C-of-A if the aircraft is certified	Yes	Not directly, but required for the issuance of the C-of-A if the aircraft is imported and certified

6. AERONAUTICAL PRODUCTS WHOSE USE IS PROHIBITED IN BRAZIL

Within the scope of civil aviation, ANAC is in charge of regulating and supervising, among others, aeronautical products and civil aviation safety. This includes requirements that determine whether an imported aircraft is eligible for obtaining a standard or special certificate of airworthiness necessary for its operation, as well as requirements for acceptance of imported engines, propellers and any parts. It also includes requirements on product marking and maintenance and manufacturing records. Together, these requirements ensure that only aeronautical products having traceability of their parts and meeting conditions for use in Brazil may be imported.

Therefore, in accordance with ANAC regulations and with the provisions of the international civil aviation agreements in which Brazil is signatory, the following imported aeronautical products are prohibited for use in Brazil and are subject to administrative measures by ANAC and by the customs authority:

AERONAUTICAL PRODUCT	RATIONALE AND LEGAL BASIS
<p>Products without export airworthiness approval when it is required (refer to section 8 of this Guide)</p>	<p>The lack of the required export airworthiness approval prevents the issuance of an Certificate of Airworthiness in Brazil, in case of aircraft, or its installation in an Brazilian aircraft, in the case of an engine, propeller or part, according to sections 21.183, 21.184, 21.185, 21.500 and 21.502 of RBAC 21 or corresponding implementation procedures described in international agreements in force.</p>
<p>Certified aircraft, engines or propellers, or their parts, in accident, damaged or scrapped condition (e.g. accident salvages)</p>	<p>Products in this condition are not eligible to an Export Certificate of Airworthiness, incurring in the prohibition above.</p>

AERONAUTICAL PRODUCT	RATIONALE AND LEGAL BASIS
<p>Products without identification markings required by RBAC 45, or with damaged markings</p>	<p>It is not possible to attest that a product complies with a type certificate without being correctly marked. As a consequence, such products are not eligible to an Export Certificate of Airworthiness, incurring in the prohibition above.</p> <p>Even if the export airworthiness approval was issued prior to the damage or removal of the plate, it becomes impossible to compare that approval to the product being imported.</p>
<p>Certified products lacking or having irregularities in documents required to demonstrate their traceability (removal maintenance records, authorized release certificate, etc.)</p>	<p>The absence of traceability or origin documentation prevents attesting conformity to the type certificate or its safe operating condition and, therefore, obtaining the export airworthiness approval or verifying the product to which the approval was issued.</p>
<p>Products not meeting conditions established in an international agreement between Brazil and exporting country</p>	<p>International agreements approved by the National Congress have the force of law and take precedence over infralegal legislation (see section 9).</p> <p>Additionally, sections 21.500 and 21.502 of RBAC 21 make explicit reference to international agreements on the matter, when existing.</p>
<p>Used light-sport aircraft</p>	<p>Paragraphs 21.190(b)(2)(ii) and 21.191(i) (3)(i) of RBAC 21 restrict the issuance of a certificate of airworthiness to new aircraft.</p>

AERONAUTICAL PRODUCT	RATIONALE AND LEGAL BASIS
<p>Finished amateur-built aircraft, either new or used, as per paragraph 21.191(g)-I of RBAC 21</p>	<p>Paragraph 21.191(g)-I of RBAC 21 prevents the issuance of an experimental flight authorization certificate for amateur-built aircraft imported after construction was finished.</p>
<p>Used tires, including newly retreaded, except for reimportation after temporary export under the terms of the applicable legislation.</p>	<p>SECEX Ordinance No. 249/2023, Art. 39.</p>

7. REQUIRED DOCUMENTATION FOR IMPORTING AERONAUTICAL PRODUCTS

Table below lists main documents that, if missing or incorrect, may prevent the issuance of a Certificate of Airworthiness for the aircraft or prevent the engine, propeller or parts from being installed in a Brazilian aircraft. The importer shall hold all documentation required by ANAC and other authorities and shall make it available for inspection whenever required.

The list of documents below is not exhaustive.

AERONAUTICAL PRODUCT	MAIN DOCUMENTS REQUIRED FOR IMPORT	REQUIREMENTS
Certified aircraft	Original Export Certificate of Airworthiness	RBAC 21, §21.183 (c) (2) (I) ANAC Resolution No. 293/2013, Art. 77, item VI
	Original acquisition title (<i>Bill of Sale</i>), when applicable <i>Bill of Sale</i> is a document issued when an aircraft is acquired upon a contract signed in a foreign country. It is only valid in Brazil after having a consular visa and after signatures are notarized by the competent local authority.	ANAC Resolution No. 293/2013, Art. 70
	Lease or other use rights agreement, if any, along with owner's express consent for registration in Brazilian Aeronautical Registry (RAB)	ANAC Resolution No. 293/2013, Art. 77, item IV
	Maintenance records of the aircraft, engines, propellers and parts having their own records (e.g., logcards for life-limited parts)	RBAC 91, section 91.417

AERONAUTICAL PRODUCT	MAIN DOCUMENTS REQUIRED FOR IMPORT	REQUIREMENTS
<p>Certified aeronautical engines and propellers</p>	<p>Regardless if new or used, Authorized Release Certificate or Airworthiness Approval Tag</p> <p>Document containing the export airworthiness approval (the approval may be in the form of a statement in the Authorized Release Certificate)</p>	<p>RBAC 21, section 21.500</p>
	<p>If used, maintenance records of the engine or propeller, in addition to previous documents.</p> <p>If used and the engine or propeller has life-limited parts, records and markings proving the life status of each life-limited part, including their own maintenance records (e.g., logcards)</p>	<p>RBAC 43, sections 43.9 and 43.11 combined with IS 43.9003</p> <p>RBAC 43, section 43.10</p> <p>RBAC 91, section 91.417</p>
<p>Parts for certified aircraft, engines or propellers, except those not requiring an export airworthiness approval</p> <p>(see section 8 of this Guide)</p>	<p>Regardless if new or Used, document containing the export airworthiness approval (the approval may be in the form of a statement in the Authorized Release Certificate).</p>	<p>RBAC 21, section 21.502</p>
	<p>If the part is used and life-limited, records and markings proving its life status, including their own maintenance records (e.g., logcards), in addition to previous documents.</p>	<p>RBAC 43, section 43.10</p>

AERONAUTICAL PRODUCT	MAIN DOCUMENTS REQUIRED FOR IMPORT	REQUIREMENTS
New light-sport aircraft	<p>Aircraft's operating instructions</p> <p>Aircraft's maintenance and inspection procedures</p> <p>Manufacturer's statement of compliance as described in paragraph 21.190(c) of RBAC 21.</p> <p>Aircraft's flight training supplement</p> <p>Documents demonstrating that the aircraft is eligible for an airworthiness certificate, flight authorization, or other similar certification in its country of manufacture</p>	<p>RBAC 21, §21.190(b)(1)</p> <p>RBAC 21, §21.190(d)(2)</p>
Standard parts, e.g., bolts, nuts, rivets, etc.	Certificate issued by the part manufacturer attesting its conformity to industry or government standards.	RBAC 21, §21.9(a)(3) and §21.502; item 5.10.4(b) of IS 21-010
Commercial parts	Excerpt from the maintenance manual or other Instructions of Continued Airworthiness proving that the part is listed in the Commercial Parts List issued by the aircraft type design holder.	RBAC 21, §21.1(b)(3)

8. EXPORT AIRWORTHINESS APPROVAL

The export airworthiness approval is a document issued by the Civil Aviation Authority of the exporting country, or by a person authorized by that authority, attesting that:

- a) The aeronautical product conforms to the type design approved in Brazil, including any special requirements; and
- b) The aeronautical product is in condition for safe operation.

The purpose of this approval is to ensure that only products suitable for use in Brazil are imported, preventing the shipment of aircraft that cannot obtain a certificate of airworthiness, or engines, propellers and parts that cannot be installed on aircraft registered in Brazil.

For aircraft, the export airworthiness approval is issued in a specific document (e.g. Export Certificate of Airworthiness). As for engines, propellers and parts, the approval is normally carried out through a statement in the part's traceability document (Certificate of Authorized Release or Airworthiness Approval Tag).

It is important to highlight that the requirement of an Export Certificate of Airworthiness (Export C-of-A) is not a mere bureaucratic requirement of an import process. The reliability of maintenance records is essential to control the continued airworthiness of an aircraft and the entire airworthiness control system was designed taking the reliability of maintenance records as one of its main pillars.

The maintenance action is in most cases intangible or abstract after it has been carried out. Therefore, the proper maintenance record is essential to make the maintenance action, in some way, tangible. As a practical example, we can see that some important tasks for ensuring flight safety, such as inspections, cannot be verified through a later airworthiness inspection, as they do not leave traces. In addition to inspections, there are other maintenance actions whose verification "with the naked eye" is humanly impossible during an inspection. Therefore, it is essential that the maintenance records of the aircraft and components can be relied upon.

Additionally, the competence of the person in charge of maintenance is also very important. There is no way, in Brazil, to readily verify whether a given maintenance task on foreign books was performed by someone authorized by the exporting Civil Aviation Authority (CAA). Without validation from the exporting CAA, a non-authorized person could unfaithfully sign off the documentation and such violation would unlikely be identifiable by the importing CAA. Only with the approval of the exporting CAA it is possible to guarantee the validity of the documentation and records presented during the inspection.

Finally, the traceability of the imported product is essential for the import process. It can be said that the Export C-of-A carries with it the commitment and responsibility of the exporting CAA for the aircraft and/or component being imported, a very important aspect for assuring safety in aviation.

Hence the need for and importance of an Export Certificate of Airworthiness. It is through the Export C-of-A that the exporting CAA guarantees that the aeronautical product was properly maintained by authorized persons and that it was duly registered and under its airworthiness control system until the time of export.

This approval applies only to type-certified aircraft, engines or propellers, and to parts for installation in such aircraft, engines or propellers.

In certain situations, the export airworthiness approval may be issued containing exceptions, upon request of the exporting authority, which are non-compliance with aspects of the Brazilian type certificate or special requirements, but which may be remedied in Brazil before the use of the aeronautical product. The export airworthiness approval to Brazil can only be issued with exceptions subject to prior consent from ANAC, and it shall follow the procedures contained in international agreements, when applicable.

It will only be possible to approve an exception in an Export Certificate of Airworthiness if the noncompliance is considered by ANAC as non-critical (with a possible solution before the Initial Technical Inspection - VTI), i.e., it shall be demonstrated that it is technically and financially feasible to solve the pending issue before the VTI and that such situation does not pose an imminent risk to flight safety. This measure aims at preventing the importation of scrapped aeronautical products that would be impossible to regularize in Brazil.

Even for parts of type-certified products, some parts do not require an export airworthiness approval to Brazil:

- a) Standard parts (see definition in section 3); and
- b) Commercial parts (see definition in section 3).

Note: *When covered by an international agreement, the export airworthiness approval shall follow the procedures contained in the agreement, which shall prevail over guidelines above.*

9. INTERNATIONAL AGREEMENTS

9.1 WHAT ARE INTERNATIONAL AGREEMENTS?

These are agreements between the Government of the Federative Republic of Brazil and the Governments of other States for the Promotion of Civil Aviation Safety. They are subject to the approval of the National Congress and any changes or acts that may result in the revision of the Agreements, as well as any additional adjustments that, under the terms of art. 49, item I, of the Federal Constitution, entail charges or burdensome commitments to Brazil, must be submitted to the National Congress for a new deliberation.

It is recognized that agreements bring mutual benefit in the implementation of improved procedures for the reciprocal acceptance of airworthiness approvals, environmental testing and development of reciprocal recognition procedures relating to the approval and monitoring of flight simulators, aircraft maintenance facilities, maintenance personnel, aeronauts and flight operations.

9.2 WHERE TO CONSULT INTERNATIONAL AGREEMENTS AFFECTING THE IMPORTATION OF AERONAUTICAL PRODUCTS?

Such agreements may be consulted on the ANAC page, at <https://sistemas.anac.gov.br/certificacao/Acordos/AcordosE.asp>.

9.3 HOW DOES THE PRECEDENCE OF AGREEMENTS OVER INFRA-LEGAL LEGISLATION WORK?

International agreements approved by the National Congress have the force of law and take precedence over infralegal legislation, prevailing under normative and regulatory texts. Any divergence regarding the interpretation or application of the Agreements or their Implementation Procedures will be resolved through direct consultations with the Parties or their civil aviation authorities, respectively.

One of the objectives of such agreements is to facilitate the acceptance of certified foreign products and consequently facilitate their import to Brazil, through the reduction of technical and bureaucratic barriers, minimizing duplicated efforts for the certification and/or validation of aeronautical products between States, therefore promoting the harmonization and equivalence of requirements.

9.4 WHAT CHANGES WHEN THERE ARE NO AGREEMENTS?

The export airworthiness approval described in section 8 remains applicable even if there is no agreement on the matter with the exporting country. In this case, the following general provisions must be followed:

- a) **Aircraft:** the Civil Aviation Authority of the exporting country shall certify that the aircraft conforms to its type design and that it is in condition for safe operation (RBAC 21, paragraph 21.183(c)(2)-I); and
- b) **Engines propellers and other components:** according to RBAC 21, sections 21.500 e 21.502, in case there is no international agreement, the import must be carried out *in the manner established by ANAC*. ANAC established the criteria for import in IS 21-010, notably in sections 5.10 (Export airworthiness approval to Brazil) and 5.11 (Customs aspects of products import).

10. MARKING AND TRACEABILITY OF AERONAUTICAL PRODUCTS

The marking of aeronautical products is the means for their identification and, consequently, for proving which aircraft it is or, in the case of engines, propellers and components, for linking that product to an aircraft.

In another approach, for the aircraft to comply with its design, both the aircraft and the components used must be identifiable, with the exception of those very small components, where identification by label or packaging is acceptable.

Product marking requirements are set out in RBAC 45 (Identification, nationality and registration marks) and include, among others:

- a) Fireproof identification plates for aircraft and engines;
- b) Fireproof markings for propellers. Usually, propeller markings are made in low relief. Fixed-pitch wooden propellers do not need fireproof marking;
- c) Markings shall always include Manufacturer and Part Number (PN) or model;
- d) Serial Number (SN): Aircraft, engines, propellers, critical components and life-limited parts must have a unique and exclusive serial number for that individual product.

In addition to identifying the aeronautical product, documentation proving that the product was manufactured and conforms to the approved design is also required:

- a) For the complete aircraft, its manufacturing record, normally present at the beginning of the airframe maintenance logbook, in addition to subsequent maintenance records;
- b) For engines, propellers and serialized components, Authorized Release Certificate / Airworthiness Approval Tag, used both to certify the conformity of the product during manufacture (signature on the left side of the form), or its approval for return to service after maintenance (signature on the right side of the form). This form is internationally standardized, and is known as SEGVOO 003 (F-100-01) in Brazil, FAA Form 8130-3 in the USA and EASA Form 1 in the European Union and other EASA member states. Normally, the export airworthiness approval for engines, propellers and components is carried out through a statement in the Observations field. The documents are governed by the following regulations:

- 1) Brazil: [Supplementary Instruction \(IS\) No. 43.9-002](#) (Use and completion of the Authorized Release Certificate (Airworthiness Approval Tag)) in its most current revision;
- 2) USA: [Order 8130.21H or later revision](#) (Procedures for Completion and Use of the Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag); and
- 3) European Union and other EASA Member States: [Appendix I of Part 21 \(Annex I of Regulation \(EU\) No. 748/2012\)](#), for new products; and Appendix II of Part M (Annex I of Regulation (EU) No. 1321/2014) for products approved for return to service after maintenance.

For non-serialized parts, the SEGV00 003 form or equivalent may also be used to attest that the product was manufactured in conformity to an approved design or approved for return to service after maintenance. For new standard parts, a certificate of conformity can also be used.

In the case of spare parts, regardless if they are imported or not, the criteria of [Supplementary Instruction \(IS\) No. 43-001](#) also apply (Eligibility, Quality, and Identification of Replacement Parts), in its current revision.

For import purposes, the product being imported must conform to the approved type design (in case of a type-certified product) and be in condition for safe operation. The requirements for the issuance of a certificate of airworthiness for the aircraft or for accepting the engine, propeller or part imported for use in Brazil are set forth in sections 21.183, 21.184, 21.185, 21.190, 21.191, 21.500 or 21.502 of RBAC 21, as applicable.

The proper marking of the product and the documentation for tracing it back to the product declared at import are essential for:

- a) the imported aircraft is registered in Brazil (according to ANAC Resolution No. 293/2013) and obtains a certificate of airworthiness, both essential for its use in Brazil; or
- b) the imported engine, propeller or component can be legally installed in a Brazilian aircraft.

Aircraft, engines, propellers and components that do not have adequate markings; that do not have the applicable traceability documentation; or that are ineligible for installation in a Brazilian aircraft, no matter the reasons, are prohibited for use in Brazil.

11. ACRONYMS

AN - Air Force-Navy Aeronautical Standard

ANAC - Brazilian National Civil Aviation Agency

AS - Aerospace Standard

ASCOM – Communications Office

C-of-A – Certificate of Airworthiness

CAA – Civil Aviation Authority

CAA-UK – Civil Aviation Authority – United Kingdom

EASA - European Union Aviation Safety Agency

EU – European Union

FAA – Federal Aviation Administration

IS – Supplementary Instruction

MS - Military Standard

NAS - National Aerospace Standards

PN –Part Number

RAB – Brazilian Aeronautical Registry

RBAC – Brazilian Civil Aviation Regulation

SAE - Society of Automotive Engineers

SECEX - Foreign Trade Secretariat of the Ministry of Development, Industry and Foreign Trade

SN –Serial Number

TC - Type Certificate

TCDS – Type Certificate Data Sheet

USA – United States of America

VTI – Initial Technical Inspection

