



Guidance Material and Industry Framework for Life-Limited Parts (LLP) & Time Controlled Components (TCC) Traceability Documentation

Edition 2

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Abbreviations

A	
AAE	Authorized Airworthiness Entity
AC	Advisory Circular
AD	Airworthiness Directive
AIR	Aircraft Inspection Report
ALS	Airworthiness Limitations Section
AMC	Acceptable Means of Compliance
AMO	Aircraft Maintenance Organization
AMP	Aircraft Maintenance Program
APU	Auxiliary Power Unit
ARC	Authorized Release Certificate
ARL	Aircraft Readiness Log
AWG	Aviation Working Group
B	
BtB	Back-to-Birth
C	
CAAC	Civil Aviation Administration of China
CAGE	Commercial and Government Entity (code)
CAMO	Continuing Airworthiness Management Organization
CFR	Code of Federal Regulations
CMM	Component Maintenance Manual
CMR	Certification Maintenance Requirement
CofA	Certificate of Airworthiness
CoR	Certificate of Registration
CRS	Certificate of Release to Service
CSC	Current Status Confirmation
CSN	Cycles Since New
D	
DAC	Direct Accumulation Count
DER	Designated Engineering Representative
DOM	Date of Manufacture
E	
EASA	European Union Aviation Safety Agency
EDS	Engine Data Submittal
EMM	Engine Maintenance Manual
ESN	Engine Serial Number
F	
FAA	Federal Aviation Administration
FC	Flight Cycle
FH	Flight Hour
G	
GM	Guidance Material

H	
HPC	High-Pressure Compressor
HPT	High-Pressure Turbine
HT	Hard Time
HTC	Hard Time Component
I	
IATA	International Air Transport Association
ICA	Instructions for Continued Airworthiness
ICAO	International Civil Aviation Organization
ICS	Incident/Accident Clearance Statement
L	
LDND	Last Done Next Due
LG	Landing Gear
LLP	Life-Limited Part
M	
MCR	Master Change Report
MIS	Maintenance Information System
MOD	Modification
MOE	Maintenance Organization Exposition
MPD	Maintenance Planning Document
MRBR	Maintenance Review Board Report
MRO	Maintenance, Repair and Overhaul Organization
MSN	Manufacturer Serial Number
MTOW	Maximum Take Off Weight
N	
NAA	National Aviation Authority
NIS	Non Incident Statement
O	
OC	On Condition
OCC	On Condition Component
OC/CM	On Condition / Condition Monitored
OEM	Original Equipment Manufacturer
P	
P/N	Part Number
PMA	Parts Manufacturer Approval
PMTS	Part Movement Traceability Sheet
PRR	Production Revision Record
S	
SARPs	Standards and Recommended Practices (ICAO)
SB	Service Bulletin
SDC	Standard Duty Cycle
S/N	Serial Number
SVR	Shop Visit Report
STC	Supplemental Type Certificate



T	
TCC	Time Controlled Components
TCCA	Transport Canada Civil Aviation
TCDS	Type Certificate Data Sheet
TCH	Type Certificate Holder
TIP	Technical Implementation Procedures
TOT	Transfer Of Title
TSN	Time Since New
U	
UCN	Unique Component Identification Number
W	
WV	Weight Variant

Background

In response to increasing supply chain challenges faced by industry over recent years, the IATA Board of Governors (currently, IATA Board of Directors) identified **'Supply Chain Constraints'** as a key strategic priority for the aviation industry. Following a supply chain workshop held in Geneva in April 2025 involving senior representatives from across the industry, three dedicated Working Groups were established. In particular, Working Group #2 was specifically tasked with implementing an 'Industry Framework' for Parts Traceability Documentation'. The objective of the defined framework is to **'counter the proliferation of non-value-added practices'** (i.e. requirements beyond regulatory compliance) for aviation parts movement and traceability. The defined framework aims to reduce subjectivity and simplify the interpretation of the industry requirements for globally accepted documentation.

Aircraft documentation is inspected meticulously during the delivery and redelivery process of an aircraft. A critical aspect of an aircraft's records is the documentation supporting the traceability of Life Limited Parts (LLPs) from manufacture to the current status. In accordance with regulatory obligations, owners / operators are responsible for ensuring that this documentation is complete, accurate, and capable of demonstrating compliance with the applicable regulatory requirements. Additionally, such documentation is considered important by industry, including lessors and aircraft owners / operators, as it can have a significant impact on the asset value and marketability of the aircraft or, as applicable, on the standalone engines or the LLP itself. Nonetheless, it is important for industry to distinguish clearly between traceability documentation required to determine LLP current status and documentation often perceived as necessary but not mandated by regulation. Developed in alignment with aviation regulations (and supporting guidance), this document presents an industry framework intended to support greater clarity and consistency across the industry.

The commercial value of LLPs is related to their remaining life. This value has created a market for trading these parts, and many part traders and brokers have developed specialization around trading LLPs. However, due to the lack of a defined industry technical standard, various parties involved in the LLP market have created a set of 'in-house' record requirements, that in many cases lead to inconsistencies with regulatory requirements and guidance. The variation in 'perceived' required documentation also results in individual parties not applying the same requirements when selling a part, versus when purchasing a part. Airlines and lessors/owners are the ultimate consumers (end users) of these parts and need a clear framework. This guidance aims to resolve these issues by providing a defined Industry Framework for Life Limited Parts trace documentation. The latest edition also introduces an industry framework for Time Controlled Components (TCC).

Finally, it should be noted that operators are subject to regulatory requirements to keep a record of hours and cycles flown, and the life remaining, in order to demonstrate the 'current status' of the LLP used in their operations. This amended guidance aims to simplify the process of establishing the 'required documentation' when transferring parts, by providing;

- Quick reference Industry Framework tables
- Detailed source information for listed 'required documents', and
- Flow-charts outlining practical examples of LLP and TCC management.

The primary objective of defining an industry framework is to align with regulatory requirements and related guidance material, while reducing supply chain constraints. This is achieved by establishing a level playing field for the transfer of parts and by eliminating the proliferation of non-value-added practices, particularly those involving excessive documentation demands driven by commercial interests rather than regulatory requirements.

Scope

Edition 1 of IATA's Guidance Material and Best Practices for LLPs Traceability covered all topics that play a role in traceability of LLPs. The document was primarily written for a technical audience (engineers working at the airline technical/engineering departments as well as technical representatives from leasing companies, parts providers and distributors) involved in the handling of LLPs. It highlighted the key challenges facing the industry at that time and addressed the technical, regulatory, legal, and commercial aspects of LLP traceability.

Edition 1 of the document also introduced practical tools such as a standardized template for capturing and exchanging essential data. While primarily focused on engine LLPs, the guidance provided principles that were broadly applicable to landing gear and auxiliary power units, with an emphasis on stakeholder clarity and digital compatibility.

One of the key objectives of Edition 1 was to tackle the then increasing volume of requests for non-value-added documentation. These practices have unfortunately continued to grow since its publication in June 2020. Accordingly, the scope for this Edition 2 has been amended to align with the industry objectives of simplification, transferability and worldwide recognition, as set out during IATA's Supply Chain Constraints Workshop.

Edition 2 of this IATA guidance document builds on Edition 1 by enhancing clarity, strengthening regulatory alignment, and supporting practical implementation across the aviation industry. The guidance incorporates provisions from relevant authorities such as EASA and the FAA and integrates harmonized recommendations from ICAO that support industry-wide standardization in the management of LLPs and continuing airworthiness records. In addition, to meet the scope of this Edition 2, the following content has been introduced:

- Industry Framework tables defining 'required documentation' when transferring LLPs and TCCs
- Cross-reference supporting material - linked to the Industry Framework (Links in tables)
- LLP Management – Practical Examples (flow charts) of LLP transfers
- Regulatory authority position regarding documents required to determine LLP Life Status
- Required LLP technical trace documentation versus commercial LLP ownership documentation

The scope of this IATA guidance also places renewed emphasis on the term 'Current Status' as the cornerstone of an acceptable industry framework for determining the 'life status' of an LLP. The guidance reinforces the principle that full due diligence, such as the verification of time since new (TSN), cycles since new (CSN), and other relevant parameters, must be carried out by an Authorized Airworthiness Entity (AAE) ([Section 8: Definitions](#)) when verifying the current status.

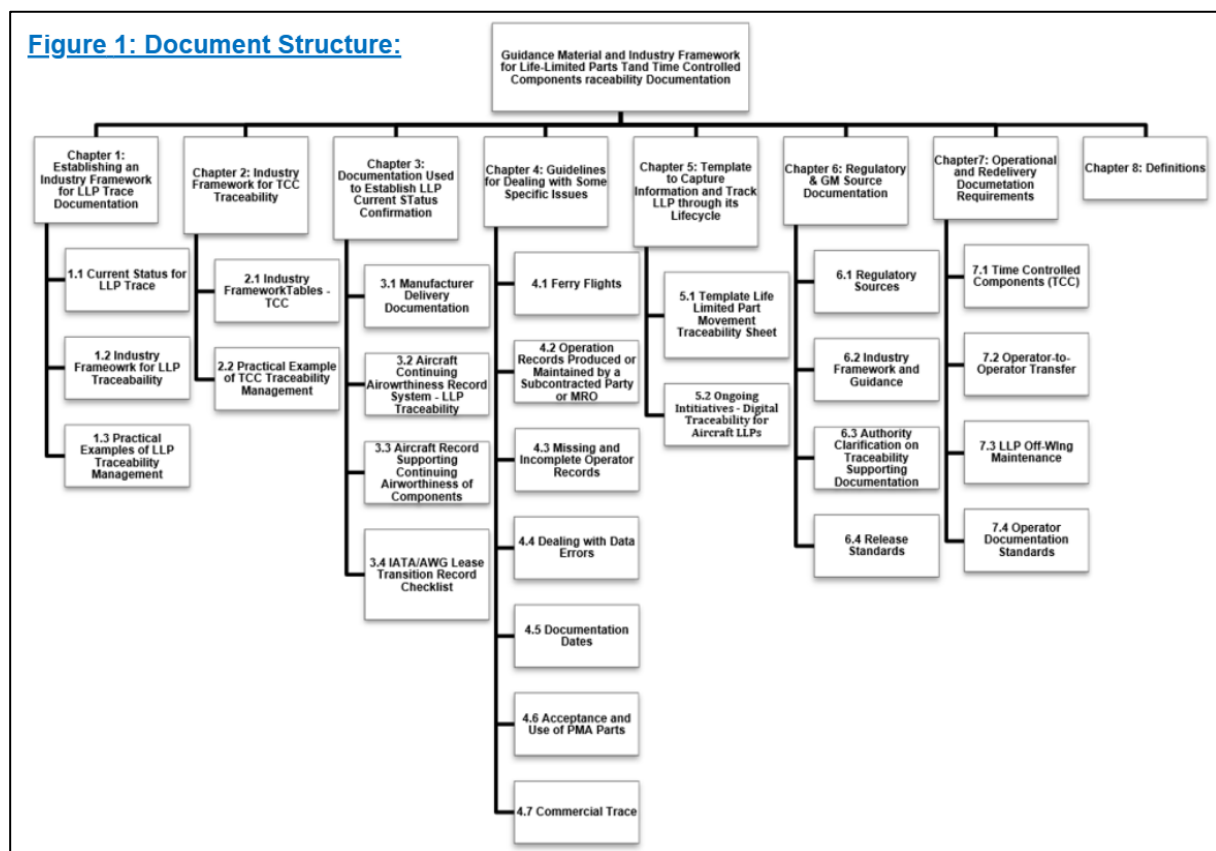
Bilateral Reciprocity: A core requirement for the effective implementation of this guidance is consistent stakeholder adherence to the 'Industry Framework'. As such, stakeholders who provide documentation in line with the Industry Framework when disposing of an asset or component should not seek additional documentation outside the framework when acquiring an asset or component.

Introduction

The sections within the document aim to provide clear guidance on the traceability, documentation, and lifecycle management of LLPs in civil aviation. Additionally, the document addresses the documentation requirements for TCCs, such as Hard Time (HT) and On-Condition (OC) items, to support regulatory compliance without imposing unnecessary burdens.

The guidance introduces quick reference 'Industry Framework' tables outlining the documentation required when transferring LLPs. To complement the tables, LLP Management flow-charts give practical examples of the transfer of LLPs. These flow-charts include cross-references back to the relevant industry framework table for the required documentation. The guidance is intended to support operators, AAEs, maintenance providers, parts suppliers, and lessors in achieving alignment with applicable regulatory requirements and supporting guidance, while also creating conditions that will help reduce supply chain constraints, through the global application of an internationally recognized industry framework.

The applicable airworthiness regulations (and subsequent Acceptable Means of Compliance (AMC), Guidance Material (GM), Advisory Circulars (AC), etc.) establish the foundation of LLP traceability. The responsibility lies in an owner/operator maintaining a comprehensive 'in-service history record' for each life-limited part, enabling the accurate determination of its 'current status' with respect to airworthiness life limitations. These guidelines differentiate between the technical documentation that is formally required and other documents that are often perceived as necessary to confirm the life status of an LLP. **Figure 1: Document Structure** outlines the contents in the following order:



1. Establishing an Industry Framework for LLP Traceability Documentation

LLP traceability is a sensitive subject in aviation asset management, and consequently, within the international aviation community.

It affects multiple parties whose interests do not always align, from airlines to lessors, to OEMs, to parts' traders, to AAEs.

- The **operator's core business** is to fly aircraft in the most cost-effective manner, in compliance with the regulations. While safe flight operations remain the primary focus, cost management is also a key consideration. This may be achieved in several ways including, minimising parts' costs while keeping the assets in a condition acceptable to the owner. Another one is to meet certain build workscope requirements with specific run times lower than the full life of a new LLP. Accordingly, operators may prefer to install used LLPs, provided these are acceptable to the lessor or to the potential buyer. Operators are responsible for maintaining an accurate system for tracking LLP status.
- The **lessor's core business** is to lease the asset in the most cost-effective manner. Leased assets may be complete aircraft and/or engines, lessors also lease components that include LLPs like landing gear or APUs. The lessor's interest is to maximize asset value while minimizing the time and cost associated with transferring the asset.
- The **OEM's core business** is to manufacture and sell safe products in compliance with applicable design regulations, while maximizing sales of new OEM parts in the aftermarket. Competition among OEMs has become increasingly intense, resulting in reduced revenues from new products while increasing revenues from aftermarket services.
- The **parts' traders core business** is to support their customer's needs regarding parts. This includes new and used parts supplied through sale and other commercial agreements. Parts' Traders are commonly known as distributors. They are primarily interested in maximizing the transactional buy-sell outcome.
- The **MROs' business** is to support their customers, mainly airlines and lessors, to ensure that LLPs meet applicable regulatory and customer requirements. In cases where MROs provide "power by the hour" type agreements, MROs may have their own commercial interest.
- The **CAMOs** and equivalent organizations under EASA or other national aviation authority systems are responsible for managing the continuing airworthiness of aircraft on behalf of their clients. Accurate tracking and documentation of LLPs is a critical element of that responsibility.

While this section focuses on LLPs, the above bullets also apply to TCCs to a lesser extent.

1.1. The Significance of 'Current Status' for LLP Technical Trace

This section outlines the regulatory requirements and associated guidance for demonstrating an unbroken in-service history record for each LLP and provides airworthiness authority clarification confirming that the regulations do not require 'Back to Birth' records to determine 'current status' of Life Limited Parts.

National regulatory frameworks, such as FAA and EASA, require operators to be able to demonstrate the current status of each LLP, namely the total time or cycles accumulated, the applicable limits, and the remaining life. Despite common industry expectations, regulatory authorities do not mandate full back-to-birth (BtB) records (traceability documentation) to determine the 'current status' / 'life status' of Life Limited Parts.

For example:

- The FAA has confirmed that "...the regulations do not require "back to birth" records in order to determine the life status of life-limited parts.". (see FAA Letter - [Determining Life Status of Life Limited Parts](#))
- EASA similarly confirms the term "back-to-birth" does not appear in regulation, and that only those In-Service History Record(s) needed to determine the current status and ensure compliance must be retained (Ref M.A.305(d)&(e)).

The term "Back to Birth" is not officially defined in aviation regulations such as those issued by EASA or the FAA, nor is it captured in ICAO SARPs. In practice, it is widely used in the parts aftermarket to describe full documented traceability of life-limited parts (LLPs) from their original manufacture to their current operational status. Regulatory requirements, however, only necessitate continuous traceability of a part's identity, life limit, and in-service history, not a complete archive of all historical records. BtB misinterpretation can lead to unnecessary documentation demands, delays, and increased costs without improving safety. To ensure clarity and alignment with regulatory standards, this document adopts a new term "Current Status Confirmation (CSC)" (see [Section 8: Definitions](#)) instead of "BtB."

Once an AAE has verified the current status for an aircraft, engine, propeller, or component, supported by an appropriate in-service history record (such as an LLP Part Movement Traceability Sheet (PMTS)), the underlying detailed maintenance records (source documents) used in the current status review do not need to be included as part of the transfer process for the associated LLP (see [Section 5.1](#)). This approach affirms that traceability is based on the certified outcome of a structured review of the detailed maintenance records (required to be retained by the operator), rather than the volume or presence of historical documents. It enables a more efficient and standardized exchange of LLPs without compromising safety or regulatory compliance, while maintaining the LLP value based on a certified 'life used / life remaining' status.

1.2. Industry Framework for LLP Traceability Documentation

One of the key objectives identified during IATAs Supply Chain Constraints Workshop held in Geneva in Apr 2025 led to the launch of a project aimed at defining an Industry Framework for Parts Traceability Documentation. This project was assigned to a Working Group which was made up of a cross-section of industry stakeholders (Airlines, OEM, MRO, Lessors). Based on the Working Group's activities, and consultation with other industry stakeholders, the following section (supported later by flow charts) outlines an 'Industry Framework' for technical LLP traceability documentation in a quick reference table format. The Industry Framework tables aim to:

- Present clear guidance for a globally accepted standard of 'required documentation'
- Create a level playing field for technical documentation required for transferring LLPs

- Reduce ambiguity and subjectivity by defining a framework for trace documentation
- Decrease supply chain constraints experienced when transferring parts, by applying a harmonized standard across all sections of the aviation industry.

The industry framework is based primarily on regulatory airworthiness requirements and does not include 'commercial' documentation (see [Section 4.7](#)) related to the 'transfer of ownership' of an asset. In practical terms, the value of an LLP is directly dependent on the 'remaining life' of the LLP, which has been verified during the LLP current status review.

The tables were developed based on the regulatory source documents detailed in Section 6 of this guidance. The tables outline the documentation necessary to establish the 'current status' of each LLP and support its traceability in accordance with applicable airworthiness regulations and associated guidance. Supporting information can be accessed via the relevant hyperlinks within each table. Four LLP tables are provided, each applicable to a specific scenario, and should be referenced accordingly.

Industry Framework Tables - LLP:

Table 1: LLP - Installed New at original 'Aircraft Delivery'

LLP – Installed new at original 'Aircraft delivery' (NEW)		
LLP Type	Required Documentation	Detailed In Section
Engine / Propeller	Authorized Release Certificate, or Aircraft (Delivery) Certificate listing ESN	3.2.4 / 3.1
	LLP listing from manufacture	3.1
	AD listing from manufacture*	3.1
	Modification listing from manufacture*	3.1
Landing Gear	Aircraft (Delivery) Certificate	3.1
	LLP listing from manufacture	3.1
APU	Aircraft (Delivery) Certificate	3.1
	LLP listing from manufacture	3.1

* Only when applicable to LLP

Table 2: LLP – Installed New at 'Higher Assembly Delivery'

LLP – Installed new at 'Higher Assembly Delivery' (New ENG / LG / APU etc.)		
LLP Type	Required Documentation	Detailed In Section
Engine / Module / Propeller	Authorized Release Certificate - NEW (Higher assembly)	3.2.4
	LLP listing from manufacture	3.1
	AD listing from manufacture*	3.1
	Modification listing from manufacture*	3.1
Landing Gear	Authorized Release Certificate - NEW (Higher assembly)	3.2.4
	LLP listing from manufacture	3.1
	AD listing from manufacture*	3.1
	Modification listing from manufacture*	3.1
	Technical Concession listing*	3.1

LLP – Installed new at 'Higher Assembly Delivery' (New ENG / LG / APU etc.)		
LLP Type	Required Documentation	Detailed In Section
APU	Authorized Release Certificate - NEW (Higher assembly)	3.2.4
	LLP listing from manufacture	3.1
	AD listing from manufacture*	3.1
	Modification listing from manufacture*	3.1

* Only when applicable to LLP

Table 3: LLP – New (uninstalled)

LLP – New (uninstalled)		
LLP Type	Required Documentation	Detailed In Section
Individual LLP	Authorized Release Certificate – NEW	3.2.4

Table 4: LLP – Used (Previously Installed)

LLP / Higher Assembly – Used (Serviceable - Previously Installed)		
LLP Type	Required Documentation	Detailed In Section
Individual LLP	Current Authorized Release Certificate	3.2.4
	In-service history record	3.2.2
	<i>Details of AD, SB, MOD, and repairs applicable to an LLP are to be confirmed included on the ARC or In-service history record.</i>	3.2.1
Engine / Module / Propeller	Current Authorized Release Certificate (higher assembly)	3.2.4
	Current LLP status	3.2.1
	Current AD status*/**	3.2.1
	Current Modification status*/**	3.2.1
	Current LLP Repair Status*/**	3.2.1
	In-service history record for each LLP / module*/**	3.2.2
Landing Gear	Authorized Release Certificate (higher assembly)	3.2.4
	Current LLP status	3.2.1
	Current AD status*/**	3.2.1
	Current Modification status*/**	3.2.1
	Current LLP Repair Status*/**	3.2.1
	In-service history record for each LLP*/**	3.2.2
APU	Authorized Release Certificate (higher assembly)	3.2.4
	Current LLP status	3.2.1
	Current AD status*/**	3.2.1
	Current Modification status*/**	3.2.1
	Current LLP Repair Status*/**	3.2.1
	In-service history record for each LLP*/**	3.2.2

* Only when applicable to LLP

** Current status reports may be included inside the SVR if the assembly had maintenance performed off-wing (See [Section 3.3.2.1](#))



1.3 Practical Examples of LLP Traceability Management

The following flow-charts have been created to provide practical examples of real-world scenarios involving the management of life-limited parts (LLPs). The process steps in the flow charts are designed to clearly list the relevant Industry Framework table (see section 1) that defines the 'required documentation' for a given LLP transfer scenario.

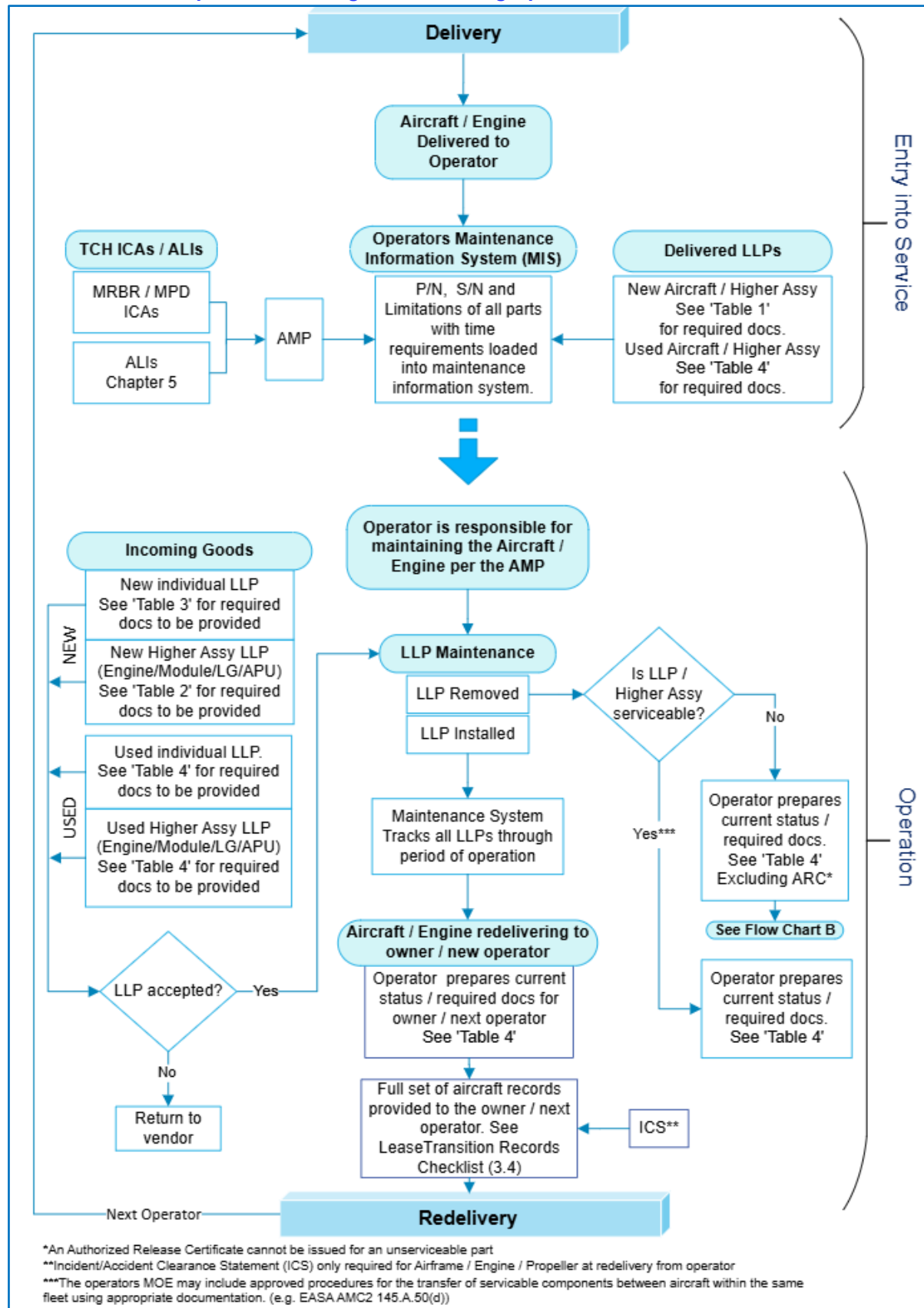
1.3.1 Example 1: LLP Management – During Operator In-Service Period

This example covers the LLP transfer process during normal airline operation, from delivery of the aircraft (or Higher Assembly - Engine/Module/LG/APU) to its redelivery.

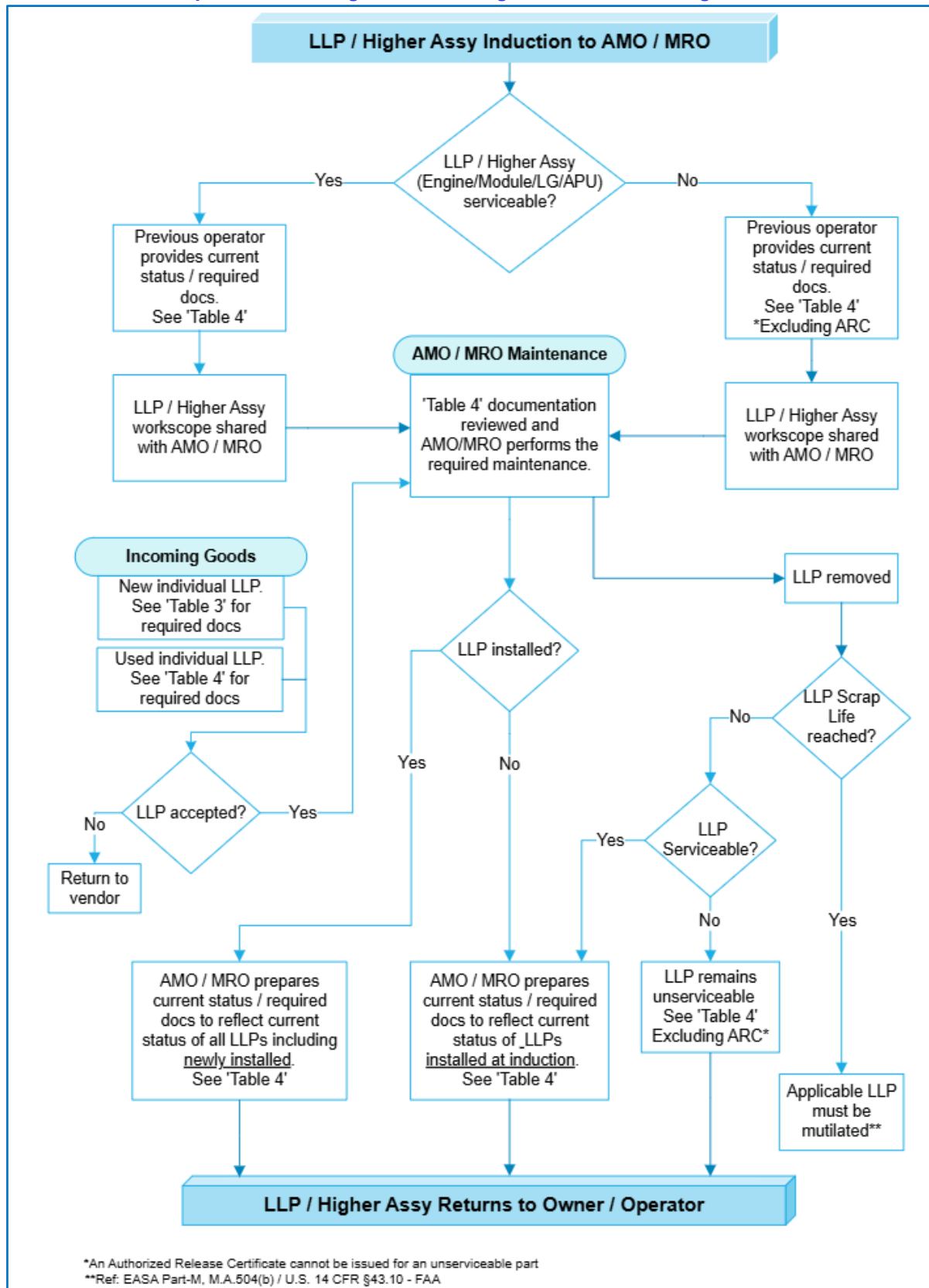
1.3.2 Example 2: LLP Management – During AMO/MRO Off-Wing Maintenance

This flowchart outlines the documentation and decision-making steps required to manage Life-Limited Parts (LLPs) during off-wing maintenance performed by an Approved Maintenance Organization (AMO/MRO).

Flow Chart A - Example 1: LLP Management – During Operator In-Service Period:



Flow Chart B - Example 2: LLP Management – During AMO/MRO Off-Wing Maintenance:



2. Industry Framework for TCC Traceability Documentation

While the main focus of this document is on Life-Limited Parts (LLPs), the management and documentation of Time Controlled Components (TCCs) remain essential for demonstrating compliance with continuing airworthiness requirements. TCCs, including Hard Time and On-Condition items, require appropriate maintenance tracking, but are not subject to the same document traceability standards as LLPs. The three TCC tables provided below can be referenced depending on the particular case being applied. The tables outline the minimum documentation necessary to meet regulatory requirements, supporting the overall aim of this document: to align with applicable regulations while avoiding unnecessary or excessive documentation demands. The framework that applies to TCCs should not be confused with those that apply to LLP traceability documentation.

2.1 Industry Framework Tables - TCC

Table 5 TCC - Installed New at Original Aircraft Delivery

TCC - Installed new at original Aircraft delivery (NEW)		
TCC Type	Required Documentation	Detailed In Section
Hard Time	Component listing from manufacture	3.1
On Condition	Component listing from manufacture	3.1

Table 6 TCC – New (Uninstalled)

TCC – Installed NEW (In-Service)		
TCC Type	Required Documentation	Detailed In Section
Hard Time	Authorized release certificate	3.2.4
On Condition	Authorized release certificate	3.2.4

Table 7 TCC – Used (Previously Installed)

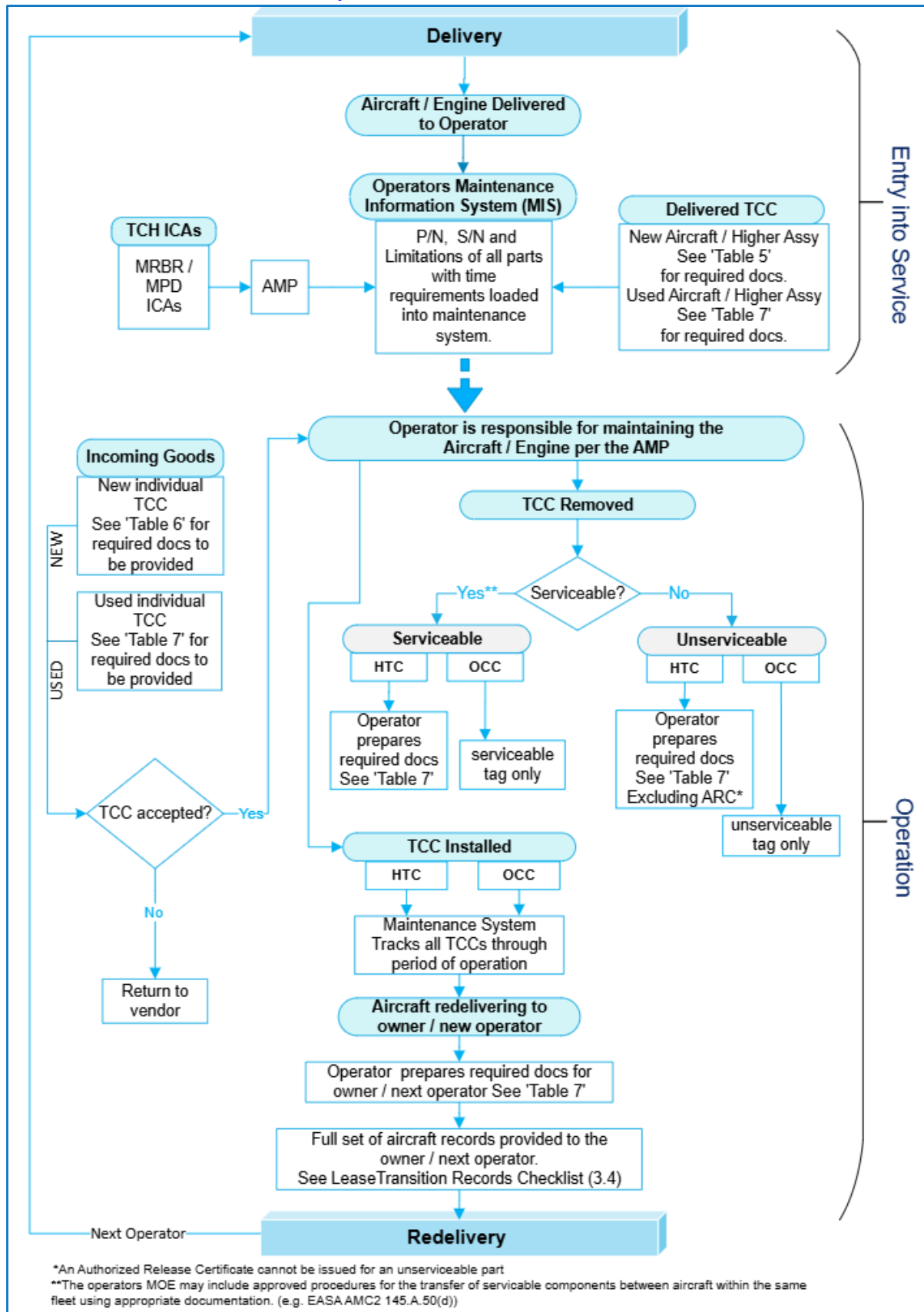
TCC – Installed Used (In-Service)		
TCC Type	Required Documentation	Detailed In Section
Hard Time	Authorized release certificate	3.2.4
	Current Status	3.2.1
	Detailed maintenance records for the last scheduled maintenance	3.3.2
On Condition	Authorized release certificate (If the maintenance was performed off wing)	3.2.4
	Current Status	3.2.1
	Detailed maintenance records for the last scheduled maintenance	3.3.2
	(If the task is controlled at aircraft level, the above information could be contained in the records related to the aircraft maintenance program)	3.3.1



2.2 Practical Examples of TCC Traceability Management

Flow Chart C (below) outlines the documentation process for TCCs throughout their operational lifecycle, from initial delivery and entry into service, through maintenance activities, to eventual aircraft redelivery. It outlines the required documentation depending on whether the component is new or used, managed off-wing or on-wing, and whether it is maintained under a hard time or on-condition schedule. The flow chart logic aligns with applicable regulatory requirements and ensures the required traceability and continuing airworthiness, during both aircraft on-wing operation and transfer.

Flow Chart C Time Controlled Components - Documentation Process:



3. Documentation used to Establish Life-Limited Part's (LLPs) Current Status Confirmation

This section reflects the most restrictive regulatory requirement and its guidance identified through a comparative review of applicable provisions from EASA, FAA, TCCA, CAAC, and ICAO, providing international applicability and alignment with some of the highest available airworthiness standards. For cases of missing or incomplete operator records refer to [Section 4.3](#).

3.1. Manufacturer Delivery Documentation

Manufacturer records, also referred to as manufacturer delivery documentation, refers to the initial set of records generated at the time a life-limited part (LLP) is manufactured. These documents serve to establish the origin (birth), configuration, and identity of the part at the beginning of its service life. Regulatory frameworks support the requirement to maintain a status for each life-limited part sufficient to determine the 'current status' of compliance with any life limitation. This requirement assumes that there is a known starting point, typically supported by manufacturing and release documentation.

When an aircraft is delivered, the Original Equipment Manufacturer (OEM) issues an Aircraft Delivery Certificate, which includes documents like a Certificate of Conformity (e.g., EASA Form 52) or an Export Certificate of Airworthiness, depending on the jurisdiction and delivery context. These certificates confirm that the aircraft meets its approved type design and design specifications and include essential identification details such as engine and propeller serial numbers. This certification forms the baseline from which configuration control and traceability is built throughout the aircraft's operational life.

At initial aircraft delivery, manufacturer delivery documentation identifies the applicable starting points, typically the Transfer of Title (ToT) date and, where applicable, the first flight date, which establish the baseline for calculating initial life accumulation and maintenance thresholds for life-limited parts (LLPs), in accordance with the approved type-design and Instructions for Continued Airworthiness. In addition to confirming the ToT date, the following are examples of specific aircraft delivery documents which can be referenced to determine the accumulated FH & FC at delivery (i.e. the utilization 'starting point' for 1st operator) :

- Airbus: Production Aircraft Test Report
- Boeing: Aircraft Flight Log Summary
- Embraer: Aircraft Log Book - Flight Hours Registration

3.1.1. Typical Documentation Format

At the point of manufacture, life-limited parts (LLPs) are delivered with a standardized package of documentation to support airworthiness certification and LLP start-point traceability. While the exact format may vary by OEM, documentation generally conforms to structured OEM delivery standards such as those issued by Airbus or Boeing. These documents provide evidence of the origin, airworthiness, and traceability of a life-limited part (LLP) at the time of manufacture or initial release. For parts installed at aircraft delivery, these records may be held at aircraft level but must still be retrievable at part level.

Typical OEM delivery documentation includes:

- Aircraft statement of conformity including engine / propeller serial number installed.
- AD status
- Modification status
- Aircraft production revision record (PRR) / Master Change Report (MCR)



- LLP Status (often inside the delivery logbook)
- Aircraft Inspection Report (AIR) / Aircraft Readiness Log (ARL)
- Engine Logbook / Engine Data Submittal
- Aircraft Concession listing / Significant rework log
- APU Logbook / LLP log cards

3.2. Aircraft Continuing Airworthiness Record System – LLP Traceability

Operator records refer to the documentation maintained by an aircraft owner / operator that tracks the in-service history, operational use, and airworthiness status of all installed components, including life-limited parts (LLPs). These records serve as the primary means by which compliance with life limitations, airworthiness directives (ADs), and continuing airworthiness requirements are demonstrated. While this guidance applies generically to all LLPs, it is important to note that certain record headers or parameters, such as specific test cell data, maximum power assurance runs, or engine-specific life tracking, are uniquely applicable to engine LLPs.

The documents listed in the following sub-sections are used to form the traceability chain and support the 'current status' and determination of airworthiness:

3.2.1. Current Status Reports

Current status reports are a core component of the aircraft continuing airworthiness record system, serving as the primary mechanism for tracking and evidencing the continuing airworthiness requirements of the aircraft and its components. These status reports provide a consolidated summary of the aircraft's configuration, maintenance condition, and compliance status, covering items such as life-limited parts, airworthiness directives, modifications, and repairs. The significance of this high-level document lies in the fact that it normally serves as the primary reference for verifying compliance, as detailed maintenance records are typically not readily accessible or centrally organized by the entities responsible for continuing airworthiness, largely due to differing regulatory frameworks and operational practices.

Operators may employ a range of tracking tools, ranging from spreadsheet-based records to complex maintenance information systems, and therefore current aircraft status reports may vary in format. Regardless of presentation, they must remain complete, legible, up to date, and accurate, ensuring traceability and the ability to demonstrate the aircraft's continued compliance with applicable airworthiness requirements.

Regulatory Requirement:

The aircraft continuing airworthiness record shall include the current status specific to LLPs: ¹

- The applicable life limitation for each affected part
- The total life accumulated in any applicable parameter (as appropriate)
- The remaining life in any applicable parameter before the life limitation is reached ¹
- An in-service history record for each life-limited part, upon which the current status of compliance with airworthiness limitations is determined ²

Where the determination of remaining life requires knowledge of the different aircraft or engine types on which the component has previously been installed, the current status shall additionally include a full installation history indicating the hours, cycles, or calendar time relevant to each installation on those different types.

¹ M.A.305 (d) / 14 CFR 91.417 / 14 CFR 121 / ICAO Annex 6



For Time-Controlled Components: the current status of a TCC must reflect compliance with the applicable maintenance intervals as defined in the maintenance schedule of the approved maintenance program. It shall include the life accumulated by the affected component in the applicable parameter since the last accomplishment of scheduled maintenance as specified in the AMP.

Note: only the data necessary to determine when the next maintenance is due is required. Where a TCC task is controlled at aircraft level and the component has not been removed since the task was last accomplished, its current status may already be demonstrated by the aircraft records and need not be separately maintained at the component level.

3.2.2. In-service History Record

Operators are required to maintain records from which the current life status of each life-limited part can be determined, ensuring traceability of flight hours, flight cycles, and any other time-in-service parameters affecting the life of the part.²

Although regulations do not prescribe a specific format, the in-service record³ must be based on approved and traceable documentation. Supporting records, such as installation/removal records, shop visit reports, ADs, modification records, and SBs, are typically used to document and validate the operational history of the part.

To support traceability and compliance, the in-service history record should include:

1. Identification of the Part: part number (PN), serial number (SN), and the verifiable starting point for life accumulation (e.g. Date of Manufacture (DOM), date of first installation, or confirmation of zero accumulated life at new), as established by the manufacturer delivery documentation
2. Installation and Removal Details:
 - a. Dates of installation and removal (i.e. date on/date off).
 - b. Details of the installation and removal (e.g. type, serial number (S/N), thrust rating, or weight variant (WV) at installation and removal of the part), where this is necessary to appropriately control the life limitation.
3. Accumulated In-Service Life:
the total accumulated life in any applicable parameter, as appropriate, corresponding to the dates of installation and removal of the part.
4. Relevant Life-Affecting Events:
embodied modifications, OEM Concessions / Variances, ADs, SBs, or product improvements, that affects the life limitation or change the limitation parameter, should be included in the in-service history record.
5. Other Measurement Units (if applicable):
where life limitations are defined using alternative parameters (e.g. APU cycles, compressor stages, landings), these units must also be recorded and traceable in the record.

Note: Not all modifications will necessarily affect a part's life limitation. Only those events that directly alter the life limit or change the limitation parameter need to be recorded. Where a parameter is not relevant to the life of the part, it does not need to be recorded.

Note: An ARC and detailed maintenance records are not required to support every installation and removal shown in the in-service history record. Only the most recently issued ARC, the current status, and the in-service history record are required as supporting traceability documentation.

² GM M.A.305/14 CFR 91.417/CFR 121.380

³ M.A.305(e)3(i)



While there is flexibility in how the in-service history record is structured, it must be sufficient to demonstrate compliance with applicable limitations, which have been established from operator-controlled source documentation.

The Part Movement Traceability Sheet (PMTS) (see [Section 5](#)), is an example of an in-service history record, and is a documented summary from which the current status of each life-limited part (LLP) can be determined.

3.2.2.1. Module Traceability

Traceability for modular assemblies such as engines, involves tracking the installed LLPs and maintaining configuration control of modules (e.g. HPC module, HPT module), particularly when modules have been swapped or overhauled independently.

Regulatory Requirement:

When owners and operators wish to take advantage of engine modular tracking, then the total life accumulated in service for each module, as well as in-service history if applicable, and detailed maintenance records for each module, should be maintained. The continuing airworthiness records as specified should be kept with the module and should show compliance with any mandatory requirements pertaining to that module.

The in-service history record should include clear details of the product or higher assembly (e.g., engine, landing gear, APU) from which the life-limited part (LLP) was removed. This information is essential to support traceability, ensuring that each transfer or removal event is documented and traceable through the part's operational history. Identifying the parent assembly also helps validate installation timelines and the accumulation of time or cycles in accordance with applicable airworthiness limitations³.

3.2.2.2. Logbooks

Separate from the on-board log, the continuing airworthiness record system consists of long-term tracking records that document the maintenance history, configuration, and airworthiness status of the aircraft and its components. These records are often collectively referred to as the aircraft, engine or APU logbook in the context of continuing airworthiness management.

While the term logbook traditionally referred to physical paper-based records, current industry practice, has increasingly shifted towards approved digital recordkeeping and maintenance information systems. Despite this evolution, the term "logbook" remains commonly used to describe these digital or paper-based records that form part of the continuing airworthiness management system. For further guidance on acceptable record formats, see [Section 7.4](#).

Regulatory Requirement:

Data included in the airworthiness record system and which could be considered as an aircraft logbook, engine logbook(s) or engine module log cards, propeller logbook(s) and log cards for life-limited parts.⁴

3.2.3. Statements

A statement serves to confirm the current status of an aircraft, engine, propeller, or component. The statement should:
identify the aircraft, the engine, the propeller or the component it applies to;

³ M.A.305(e)3(i)

⁴ AMC M.A.305(e) / 14 CFR 91.417



be dated to reflect the point in time the information is valid; and include the total accumulated in-service life as measured by the applicable parameter (e.g., flight hours, flight cycles, calendar time) as of the stated date.

Regulatory Requirement:

There is no explicit regulatory requirement to use statements as part of the Aircraft Continuing Airworthiness Record System. Statements confirming the current status of an aircraft, engine, propeller, or component, including total time, cycles, and configuration, will be included within aircraft status reports as formal, certified summaries. Statements that verify compliance with an airworthiness directive (AD), modification, or repair are typically already documented within the status report under the relevant current status.

3.2.3.1. Incident/Accident Clearance Statement (ICS)

The Incident/Accident Clearance Statement (ICS) is a standardized declaration developed by IATA and the Aviation Working Group (AWG) to replace the previously used Non-Incident Statement (NIS). The ICS is issued only at the aircraft, engine or propeller (Type Certified Product) level, though it may include details at the major assembly level (landing gear, APU). The ICS is not required for the transfer of individual parts or components below Type Certificate level. Its purpose is not to establish a parts operational history (the in-service history record fulfills this purpose) but to confirm the Type Certified Product (or part thereon) has met the conditions stated in the ICS. The ICS is not a regulatory requirement and does not replace certified technical records or in-service history. Two ICS templates have been designed, one to cater for aircraft, the other for standalone engines – [See IATA website](#).

Note: As outlined in the ICS guidelines and background information; the operator ***“declares that the Type Certified Product has been deemed acceptable for continued use”***, therefore, ‘previous’ operator ICSs for that ***Type Certified Product*** are superseded (i.e. the ICS declaration for the most recent period of operation supersedes previous declaration(s)).

See [Appendix 1: Incident/Accident Clearance Statement](#) for ICS templates and guidelines.

3.2.4 Authorized Release Certificates LLPs

An Authorized Release Certificate (ARC) is a document issued by an approved maintenance or production organization to certify that a component, including a life-limited part (LLP), has been manufactured, maintained, inspected, or overhauled in accordance with approved data and is considered airworthy. The Certificate does not constitute approval to install the item on a particular aircraft / engine / propeller, or part thereon) but helps the end user determine its airworthiness approval status.

The form of the ARC will depend on the regulatory jurisdiction under which the maintenance was performed. Recognized forms can include the EASA Form 1 (Regulation (EU) No 1321/2014), FAA Form 8130-3 (FAA Order 8130.21J / AC 43-9D), Transport Canada Form One (CARs Standard 571), ANAC Form F-100-01 (RBAC 43/145), and CAAC Form AAC-038 (CCAR-145). Where a bilateral airworthiness agreement exists, a certificate issued under one jurisdiction may automatically be accepted by another; where no agreement exists, a dual release or additional national release may be required.

Regulatory Requirement

Any component released to service, including LLPs, must be accompanied by an ARC with a valid release to service statement issued by an appropriately approved organization under the applicable regulatory framework. In the case of LLPs, the certificate should⁵:

⁵ AMC M.A.305(a) / Appendix II to Part M / 14 CFR 91.417 / 14 CFR 121

- Identify the part number and serial number
- Detail the total life accumulated in any applicable parameter (e.g. flight hours (FH), flight cycles (FC), or calendar time); for new parts with no accumulated service life, this may be indicated as zero time / zero cycles or by reference to the date of first installation or manufacture
- Provide details of work performed
- Detail maintenance documentation used, including the revision status, for all work performed
- List deviations from the customer work order.
- May provide release statements to satisfy a foreign civil aviation authority maintenance requirement

Historical ARCs, statuses, or detailed maintenance records are not required to be kept supporting every installation/removal shown in the in-service history record. Only the most recently issued ARC, current status and in-service history record are required as supporting CSC documentation.

3.3. Aircraft Records Supporting Continuing Airworthiness of Components

3.3.1. Maintenance Program Requirements

Life-Limited Parts (LLPs) must be managed with strict control to ensure removal from service before reaching their approved life limits. These requirements are defined within the approved Aircraft Maintenance Program (AMP), which is based on the Type Certificate Holder's Instructions for Continued Airworthiness (ICA) and the Airworthiness Limitations Section (ALS).

Operators are required to track and control life-limiting parameters for each LLP, including:

- Total Time in Service (flight hours)
- Total Cycles (take-off and landing events or engine cycles)
- Calendar time, where applicable

Each LLP must have a clearly recorded life limitation and an accurate current status, showing:

- The accumulated life in all applicable parameters
- The approved life limit(s)
- The calculated remaining life before removal is required

It is the operator's responsibility to accurately track all LLP requirements within their Maintenance Information System (MIS) throughout the duration of their operation. This includes calculating, updating, and maintaining the life status of each LLP in accordance with approved airworthiness data and operational inputs. The tracking must be supported by reliable sources such as flight logs, shop visit documentation, and certified maintenance records, ensuring that no LLP exceeds its approved life limit under the operator's control.

Regulatory Requirement:

The aircraft continuing airworthiness records shall include the current status specific to:

- life-limited parts, including the life accumulated by each affected part in relation to the applicable airworthiness limitation parameter
- an in-service history record for each life-limited part⁶

⁶ M.A.305 / 14 CFR 91.417



3.3.2. Detailed Maintenance Records

Detailed maintenance records document compliance with airworthiness requirements and provide information about the current status and operational history of LLPs and TCCs. The records shall include the certificate of release to service (CRS), detailed maintenance records of the most recent scheduled maintenance, and documentation of any following unscheduled maintenance related to each LLP and TCC. This information is required to be kept until it is replaced by a scheduled maintenance record of comparable scope and detail, covering a period not shorter than 36 months.⁷

For components subject to airworthiness limitations, key information is generally recorded on the authorized release certificate (e.g. EASA Form 1 or equivalent). In the case of life-limited parts (LLPs), additional supporting information may be found in the in-service history record or other relevant airworthiness documentation, such as records of AD compliance, approved MODs, and structural or component repair history.⁷

Detailed maintenance records for the last scheduled maintenance may be included in the Workshop Report.

3.3.2.1. Shop Visit Reports

Shop visit reports (SVR) refer to the documentation generated during off-wing maintenance events, typically involving engines, APUs, landing gear, or other major components. These events occur when the component is removed from the aircraft and sent to an approved maintenance facility for inspection, repair, overhaul, or modification.

The SVR provides a formal summary of the scope of work performed, parts replaced or repaired, findings, life usage updates, compliance with airworthiness directives or service bulletins, and any changes to configuration or serialized components.

Regulatory Requirement:

Operators are responsible for extracting relevant airworthiness data from shop visit documentation to update the current status and in-service history records of components subject to mandatory maintenance requirements. This includes detailed maintenance records related to time-controlled and life-limited components.

Typical Documentation to be Extracted from a Shop Visit Pack:

The following list contains documentation commonly reviewed and used to update the current status, in-service history record, and compliance with applicable airworthiness requirements:⁷

- Authorized release certificate
- LLP Status
- AD status
- SB status
- Modification and repair records
- Dimensional inspection reports - measurement data from inspections of LLPs (if applicable)
- Parts replaced certification and supporting documentation
- Maintenance program requirements

3.3.2.2. Demonstrating Compliance

The operator holds the primary responsibility for the continuing airworthiness of the aircraft, including the management of all installed life-limited parts. This responsibility includes demonstrating compliance with airworthiness limitations, airworthiness directives, and approved maintenance

⁷ GM M.A.305 / 14 CFR 91.417



program tasks. This compliance must be demonstrated through verified and up-to-date records that reflect the life status and service history of each life-limited part.

Regulatory Requirement:

The CRS and detailed maintenance records must:

- Show compliance with ADs;
- Confirm current status of applicable modifications, repairs, and airworthiness limitations;
- Document the latest scheduled and unscheduled maintenance, retained for at least 36 months or until updated by equivalent information.⁸

3.4. IATA / AWG Lease Transition Record Checklist

The documentation requirements outlined in [Section 3](#) of this guidance take reference from the IATA/AWG Lease Transition Records Checklist, which is widely used as an industry benchmark for aircraft and engine transitions, helping to standardize and streamline operator-to-operator transfers globally. It should be noted, however, that the checklist is broader in scope than the LLP and TCC documentation requirements addressed in this guidance, as it covers the complete aircraft historical records package required during a full lease transition, and should not be interpreted as defining the documentation standard for individual LLP or TCC transfers. The 'required documentation' for those transfers are defined by the industry framework tables in [Sections 1](#) and [Section 2](#) of this guidance.

The latest revision of the IATA / AWG Lease Transition Check List can be found using the following [link](#).

⁸ GM M.A.305 / 14 CFR 91.417



4. Guidelines for Dealing with Some Specific Issues

4.1. Ferry Flights

In certain cases, aircraft may be flown on behalf of the owner or lessor, such as transfers between storage facilities, movements from OEM delivery centers, or ferry operations while off lease, without being under the operational control of an airline operator. In such instances, the responsibility for maintaining and updating continuing airworthiness records, including those related to life-limited parts (LLPs), rests with the entity assuming airworthiness oversight during this period. This entity may be the AAE appointed by the owner/operator.

To ensure traceability of LLPs remains continuous and verifiable, a certified log of all ferry flights must be maintained, including:

- Date of each flight
- Aircraft total flight hours and cycles accumulated during the operation
- Any additional information about each flight, necessary to ensure continued flight safety

Once the aircraft is accepted by the next operator, the updated technical records, reflecting the ferry flight(s), should be transferred as part of the full technical records package, along with the Incident Accident/Clearance Statement (ICS), if applicable.

4.2. Operation Records Produced or Maintained by a Subcontracted Party or MRO

Continuing airworthiness records may be maintained by a subcontracted organization on behalf of the operator, however, responsibility for these records remains with the operator. The operator must be provided with/have access to up-to-date records, including the current status of AD compliance, LLPs, and time-controlled components, in accordance with agreed procedures. The operator must also have unrestricted and timely access to the original records whenever required. Even when the operator authorizes a maintenance organization to retain copies of these records on its behalf, the ultimate responsibility for the integrity, accuracy, and transferability of the records remains with the operator. Should the operator cease to manage the aircraft, it remains responsible for transferring the complete and accurate records to the next person or organization responsible for continuing airworthiness management.⁹

4.3. Missing or Incomplete Operator Records

In circumstances such as repossession, bankruptcy, or loss of operational control, an aircraft may be removed from an operator's fleet without full access to its current technical records. This can include essential documentation related to ADs, LLPs, and other time-controlled components required to demonstrate continuing airworthiness.

When the operator is no longer able or available to produce the necessary documentation, such as for the purpose of LLP traceability, the aircraft owner or lessor may engage an AAE to review available documentation and generate an updated record set.

In such cases, the following approach is considered acceptable under this guidance:

- The engaged organization must be authorized and competent to perform airworthiness reviews or technical assessments.

⁹ **AMC M.A.305/ M.A.307/14 CFR 121.380**



- The reconstructed records must be reviewed and certified by that organization.

Where complete documentation cannot be recovered, the AAE appointed by the owner/operator may generate a signed statement describing the circumstances of the loss and establishing the current status based on researched evidence. This reconstructed record should be submitted to the competent authority for review and acceptance. The authority may require additional maintenance or inspection if not satisfied with the substantiation.

This process aligns with regulations such as EASA and FAA principles on record loss and reconstruction, providing a path to restore airworthiness traceability and support continued operations or asset transition, while maintaining safety and regulatory compliance.¹⁰

4.4. Dealing with Data Errors

Errors in technical records that affect the airworthiness or life status of LLPs, particularly those that affect TSN, CSN, or part identity, must be addressed in a manner that preserves the integrity of the continuing airworthiness record system.

The preferred method of correction is for the original issuing organization (e.g. AAE) to reissue the affected documentation with corrected and certified data.

However, in many cases, such as when the original organization is no longer in business, declines to acknowledge the error, or when the project has been formally closed, reissuance may not be possible.

In such cases, the guidance is as follows¹¹:

A correction letter issued by an AAE appointed by the owner/operator that:

- Explains the nature of the error and how it was discovered.
- Details the correction being made.
- References any substantiating backup documentation (e.g. flight logs, prior maintenance entries, shop visit summaries).
- A correction (handwritten or electronically annotated) should be made on the affected documentation, clearly identifying the correction.
- The correction should be dated, signed, and traceable to the authorized person or organization making the correction.
- Where electronic records are used, the system should include a provision to append corrections to the original LLP file or record. These corrections must:
 - Not obscure or delete the original entries.
 - Be appended with a timestamp and authorization signature.
 - Include an explanation and justification for the correction.

Where discrepancies are unresolvable and affect the ability to determine current status, it may be necessary to involve the OEM and/or competent authority and perform additional maintenance, inspections, or part replacements to re-establish compliance.

Error(s) on an Authorized Release Certificate (EASA Form 1, FAA 8130-3):

- If an end-user finds an error(s) on a certificate, he must identify it/them in writing to the originator. The originator may issue a new certificate only if the error(s) can be verified and corrected.

¹⁰ AMC M.A.305(e)/AC 43-9D

¹¹ GM M.A.305



- The new certificate must have a new tracking number, signature and date.
- The request for a new certificate may be honored without re-verification of the item(s) condition. The new certificate is not a statement of current condition and should refer to the previous certificate in block 12 by the following statement; 'This certificate corrects the error(s) in block(s) [enter block(s) corrected] of the certificate [enter original tracking number] dated [enter original issuance date] and does not cover conformity/condition/release to service'. Both certificates should be retained according to the retention period associated with the first.

4.5. Documentation Dates

Technical documentation related to LLPs does not need to be issued on the same calendar date as the operational event it describes. For instance, an engine may be removed from service on a given date, with supporting documentation, such as an in-service history statement or updated LLP status, issued several days later. This is acceptable provided the aircraft, engine, or component has not been operated in the interim and the documentation accurately reflects the actual operational timeline and configuration at the time of removal. What is essential is that the recorded dates correspond correctly to the in-service events in order to ensure compliance with continuing airworthiness requirements.

4.6. Acceptance and Use of FAA PMA Parts

PMA parts may be accepted within the FAA and EASA regulatory frameworks as alternatives to OEM parts. "Non PMA / DER statements" for the LLP originating engine shall not be considered as part of the LLP traceability checks.

Further guidance can be found using the following:

IATA: [Guidance Material and Best Practices for Alternate Parts \(PMA\) and Approved \(non-OEM\) Repairs \(DER\)](#) and [Guidance Letter](#).

FAA: [Parts Manufacturer Approval \(PMA\)](#)

EASA: [EASA Position on PMA](#)

4.7. Commercial Trace

Commercial traceability to the ownership documentation of a high value asset is typically limited only to an Aircraft, Engine or APU (titled assets). Commercial documents are not required to meet regulatory and airworthiness requirements for technical LLP trace status verification (current status). This guidance material focuses specifically on airworthiness requirements and parts traceability documentation standards for life limited parts and time controlled components, which is sufficient to determine part eligibility and continued use under regulatory requirements. Therefore, while commercial documentation may be required for specific contractual or financial purposes, they do not support regulatory compliance.

The following is required to confirm commercial trace (ownership) of an Aircraft, Engine or APU prior to sale to a new owner:

- Bill of Sale / Transfer of Title (ToT) listing the 'current' owner (i.e. pre-sale)
- Letter of Comfort or Tie-In Letter, linking SPV with a parent company (if applicable)

Note: Only the latest BoS is required when transferring any high value asset.

4.8. Use of Ad-Hoc Statements - Parts Transfer

The practice of requesting or issuing unnecessary Ad-Hoc statements to support the transfer or movement of components has become increasingly common. These often include (but not limited to):

- Non-operation statements
- Statements of storage history
- Declarations of compliance with ADs or SBs
- Statements regarding operating regions or flight conditions

While such documents are known to be requested for convenience, they are not required by regulation and should not be considered part of the airworthiness trace documentation package, nor should they be deemed to be a requirement to affect commercial value.

As outlined in [Section 3.2.3](#), the condition of an LLP or TCC must be demonstrated through certified current status reports and continuing airworthiness records. These documents contain the required information to establish regulatory traceability, service history and life status.

4.9. Use of OEM Approved Accumulation Counting

As a result of the extensive data some engine OEMs are receiving and analyzing for individual engines (methodology and software certified by regulators); they no longer need to apply generic or worst-case LLP life assumptions to every engine LLP and can extend the time on-wing for engines. The Rolls Royce Direct Accumulation Count (DAC) system is one example used in industry.

While a non-standard accumulation counting system may result in an engine cycle value that is higher or lower than a Standard Duty Cycle (SDC) for a given flight, the cumulative value will be consolidated in the final redelivery in-service history record reflecting the total Cycles Since New (CSN (DACs)). The next operator must use the previous operator's CSN value as the starting point for tracking LLP life in their maintenance information system (or to continue using the DAC system for a RR engine, if applicable).

5. Life-Limited Part Movement Traceability Sheet – In-Service History Record Example

An LLP Part Movement Traceability Sheet (PMTS) is one method used to compile and maintain a continuous and verifiable record of an individual life-limited part's in-service history. Applicable regulatory frameworks, including EASA, FAA, and TCCA, require that such a record be maintained from which the current life status of each LLP can be determined; the PMTS represents a commonly accepted means of providing this information. Equivalent record-keeping systems may also be used, provided they achieve the same objective and they contain the minimum content set out in [Section 3.2.2](#). In all cases, the record must contain sufficient detail to enable an AAE to verify (and endorse) with applicable life limitations of the LLP at any point of movement in the part's service life.

The PMTS provides a consolidated view of the part's usage and traceability throughout its service life, supporting:

- Traceability of the part's identity and history from new
- Tracking of the aircraft, engine, propeller or assembly on which the part was installed including relevant identifiers (e.g. serial number, thrust rating, weight variant), where this information is necessary to appropriately control the applicable life limitation
- Accumulated life data in all applicable parameters (e.g. flight hours, flight cycles, landings, calendar time)
- Association with relevant shop visits and maintenance events

Note: An ARC and detailed maintenance records are not required to support every installation and removal shown in the in-service history record. Only the most recently issued ARC, the current status, and the in-service history record are required as supporting traceability documentation.

The following templates ([Section 5.1](#)) may be used or adapted as examples of a life-limited part in-service history record, provided that all minimum mandatory requirements are maintained as identified in [Section 3.2.2](#).



5.1. Template(s) - Part Movement Traceability Sheet (PMTS)

Figure 2: PMTS - Landing Gear LLP

Add letterhead																			
PART'S DESCRIPTION PIN, PINTLE, REAR - LH				Part Movement Traceability Sheet										PART'S S/N AF1234					
				LIMIT REF. DOC		PART		HIGHEST ASSY				AIRCRAFT							
DATE			Release Doc Number	AIRBUS ALS	P/N	TSN	CSN	P/N	S/N	TSO	CSO	Model	MSN	WV	Tail Sign	TSN	CSN	POS	Endorsement
On	Off	Reason																	
16-Apr-2015				60000	D3215303000800	0	0	D32153032000800	AF1234	0	0	A320-214	4321	013	EI-9876	0	0	LH	Joe Bloggs Quality Manager 123 airlines
	28-Aug-2024	OVH	SLSS E F12-3456	60000	D3215303000800	19687	14721	D32153032000800	AF1234	19687	14721	A320-214	4321	013	EI-9876	19687	14721	LH	
11-Mar-2025				60000	D3215303000800	19687	14721	D32153032000800	AF1234	19687	14721	A320-232	6543	008	EI-8765	42010	30203	LH	
MAJOR REPAIRS				REMARKS															
Airbus repair N°		Approval date		Reduced life				TSO* = TSN (initial TBO only) // CSO* = CSN (initial TBO only)											
				TSN		CSN													



Figure 3: PMTS – Engine LLP

Add Letterhead
LIFE LIMITED PART (LLP) MOVEMENT HISTORY SHEET

PART NUMBER: 5A1757 SERIAL NUMBER: RSTDK33910

PART DESCRIPTION: FAN DISK

OPERATOR				INSTALLED ASSEMBLY						PART									
OPERATOR	TYPE AND MODEL	AC REG	MSN	DATE	TYPE	THURST RATING	S/N	TSN	CSN	DATE ON WING	DATE OFF WING	P/N	TSN	CSN	LIFE LIMIT		HOURS & CYCLES REMAINING		REASON FOR RECORD ENTRY/ REMARKS
															HOURS	CYCLES	HOURS	CYCLES	
IAE												5A1757	0.0	0	N/A	20,000	N/A	20,000	Production
US AIRWAYS	A320-231	N637AW	104	29/06/2005	V2500A1	27,000 lbs	V0086	44,565	19,956	dd-mm-yyyy	dd-mm-yyyy	5A1757	0.0	0	N/A	20,000	N/A	20,000	Installation
US AIRWAYS	A320-231	N637AW	104	15/09/2008	V2500A1	27,000 lbs	V0086	55,103	24,552	dd-mm-yyyy	dd-mm-yyyy	5A1757	10538.0	4,596	N/A	20,000	N/A	15,404	Removal
US AIRWAYS	A320-231	N637AW	104	16/04/2009	V2500A1	27,000 lbs	V0086	55,103	24,552	dd-mm-yyyy	dd-mm-yyyy	5A1757	10538.0	4,596	N/A	20,000	N/A	15,404	Installation
US AIRWAYS	A320-231	N637AW	104	24/02/2010	V2500A1	27,000 lbs	V0086	57,413	25,594	dd-mm-yyyy	dd-mm-yyyy	5A1757	12848.0	5,638	N/A	20,000	N/A	14,362	Removal
US AIRWAYS	A320-231	N637AW	104	13/03/2011	V2500A1	27,000 lbs	V0086	57,413	25,594	dd-mm-yyyy	dd-mm-yyyy	5A1757	12848.0	5,638	N/A	20,000	N/A	14,362	Installation
US AIRWAYS	A320-231	N637AW	104	20/08/2013	V2500A1	27,000 lbs	V0086	64,615	28,989	dd-mm-yyyy	dd-mm-yyyy	5A1757	20050.0	9,033	N/A	22,000	N/A	12,967	Change in Life parameter
US AIRWAYS	A320-231	N637AW	104	20/08/2013	V2500A1	27,000 lbs	V0086	64,615	28,989	dd-mm-yyyy	dd-mm-yyyy	5A1757	20050.0	9,033	N/A	22,000	N/A	12,967	Removal
US AIRWAYS	A320-231	N637AW	104	15/11/2013	V2500A1	27,000 lbs	V0086	64,615	28,989	dd-mm-yyyy	dd-mm-yyyy	5A1757	20050.0	9,033	N/A	22,000	N/A	12,967	Installation
US AIRWAYS	A320-231	N637AW	104	15/01/2015	V2500A1	27,000 lbs	V0086	66,103	29,887	dd-mm-yyyy	dd-mm-yyyy	5A1757	21538.0	9,931	N/A	22,000	N/A	12,069	Removal
AERCAP	A320-231	N637AW	104	15/01/2015	V2500A1	27,000 lbs	V0086	66,103	29,887	dd-mm-yyyy	dd-mm-yyyy	5A1757	21538.0	9,931	N/A	22,000	N/A	12,069	Change of operator

Approved / Certified / Endorsed by	Signature / Stamp	Date
[Print name]		



5.1.1. Definitions and Instructions on How to Fill out the Template

This section defines all the items on the LLP Movement Traceability Sheet(s) and explains how to fill out the required information.

1. LLP Movement Traceability Sheet Header Item definitions

i. Part Number:

The OEM, supplier or industry standard identity for the subject part (e.g. ATA iSpec 2000, 2200 etc. format), assembly, kit or material item. The Part Number, when linked with its unique manufacturers code (e.g. CAGE code) unambiguously identifies a given item.

ii. Serial Number:

A part Serial Number (S/N) or Unique Component Identification Number (UCN), together with the identifying code of the manufacturer or issuing organization, uniquely identifies the part throughout its entire service life, regardless of any subsequent changes to the Part Number.

iii. Part Description:

Specifies the full descriptive name of a part or component according to the OEM's sourcing document. Where OEM's sourcing documents use differing nomenclature for the part or component, one should preferentially use the nomenclature published in the production approval holder's Illustrated Parts Catalogue (IPC). If such nomenclature is unavailable, then one may rely on the nomenclature published in a production approval holder's instruction for continued airworthiness (such as an Engine Maintenance Manual (EMM)). If neither of these resources exist, then one may rely on a Vendor Component Maintenance Manual (CMM).

2. LLP Movement Traceability Sheet - Part Tracking Data

Before going into the definitions of the LLP Movement Traceability Sheet Items, it's worth noting that the key items on the header row (Operator, Installed Aircraft, Installed Assembly, Part) represent the confirmed starting point of the part (LLP).

- **Operator:** Name of the operator responsible for the part. If the part is under the control of an owner (e.g. a lessor), and used in staging or test flights, those flight times should also be recorded.
- **Installed Aircraft:**
 - **Type/Model:** Aircraft type and model in which the LLP was installed.
 - **REG:** Aircraft registration
 - **MSN:** (Manufacturer's Serial Number):
 - **MTOW / WV:** Only applicable for landing gear LLPs; indicates certified MTOW / WV reference to determine MTOW.
- **Installed / Higher Assembly:** Record details of the higher assembly in which the LLP was installed (e.g., engine, APU, landing gear):
 - **Date On Wing / Off Wing**
 - **Type:** Assembly Type
 - **Thrust Rating** (for engine LLPs only)
 - **S/N: Assembly Serial Number**

- **TSN:** Time Since New at time of Installation/Removal. TSN to be reported in flight hours and rounded up as follows: integer rounded up, e.g. 3,422.3 or 3,422.8 will be rounded as 3,423, as appropriate/required in each case.
- **CSN:** Cycles Since New at time of Installation/Removal.
- **Part:** Installed part details:
 - **Installation / Removal Dates** (Date On / Date Off)
 - **P/N:** Part Number
 - **TSN:** Current Time Since New of part. (hours rounded up – see above)
 - **CSN:** Current Cycles Since New of part
 - **Life Limit:** Certified limit in the type design, and detailed in the Instructions for Continuing Airworthiness (ICAs) or maintenance manual
 - **Cumulative Utilization:** Reflects actual life consumed (hours rounded up – see above)
 - **Hours and Cycles Remaining:** Calculated as Life Limit minus Utilization.
- **Reason for Record Entry**, for example:
 - Production
 - Installation
 - Removal
 - Change of Operator
 - Change in Operational Parameters
 - Commercial & Policy (includes: Stagger, Spare, Leasing, Convenience...)
 - Functional Test
 - Modification
 - Overhaul
 - Repair
 - New Part
 - Internal Shop Check
 - Lease Return

Approved / Certified / Endorsed: A formal validation entry confirming that the data recorded (e.g. time/cycle, installation/removal, configuration) has been verified as accurate and complete by an authorized person or entity, such as an AAE.

Format Standards: Note that there are existing standards that can be used for the format (e.g., dates) of the PMTS (e.g., by ATA e-business and others).

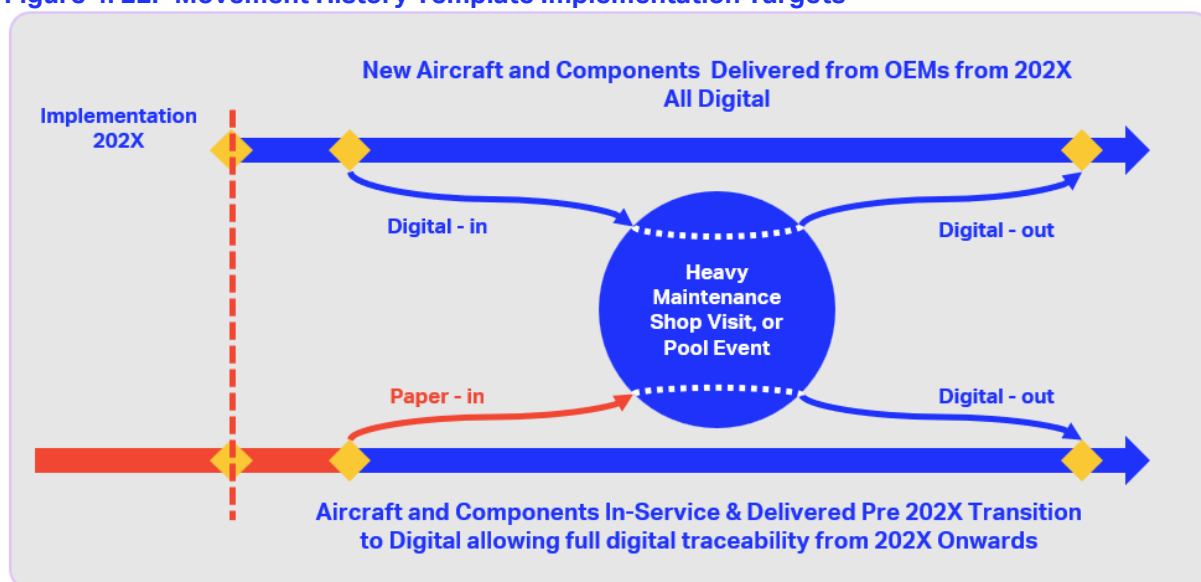
5.2 Ongoing Initiatives – Digital Traceability for Aircraft LLPs

As the aviation industry advances toward greater transparency and efficiency in parts management, the future of in-service history tracking is firmly rooted in digital traceability. While no formal regulatory framework yet exists specifically for digital twins or electronic traceability templates for life-limited parts (LLP), multiple industry and research initiatives are driving progress. These include Distributed Ledger Technology (DLT) systems such as blockchain which provide immutable tamper-proof ledger traceability models. As discussed in Edition 1, LLP traceability will be documented using what we call the “Part Movement Traceability Template”. This template is an electronic file (which can be identified as the LLP’s digital twin, or digital passport) that follows the part throughout its life. The AAE appointed by the owner/operator records the various relevant activities/events relating to the LLP during its operational life with that owner/operator. In practice, the ‘LLP Traceability Template’ format can be a simple spreadsheet (Excel), another digital file or part of a dedicated digital entry/record database containing the required data fields/parameters.

The goal is to have the first record of an LLP in the electronic file inserted by either the part manufacturer or the airframe manufacturer that signs off the delivery of it to the first operator. It then becomes the operator's responsibility (or that of a delegated entity, like CAMO, depending on the regulations) to continue adding to the file as relevant LLP events/activities occur. When the LLP moves to a different operator, it is signed off and the new operator is responsible for capturing the activities from the time the LLP enters its operation. The previous operator retains access to the record up to the time the LLP was transferred.

The digital file can get transferred from one entity to the other or can reside in the form of a MIS file with the operator, a cloud-based file, a blockchain solution, etc. depending on operator's requirements. The owner/operator of the LLP has certain "adding" rights, e.g. information can only be added to the file using a timestamp. Currently, some operators and other entities use electronic file solutions to track and trace LLPs, but a globally accepted electronic solution (e.g. master cloud-based database) has not been adopted and implemented as yet. IATA has proposed that an implementation plan is introduced and adapted by the industry starting on a mutually agreed date as below:

Figure 4: LLP Movement History Template Implementation Targets



IATA recommends use of a **digital "LLP Movement Traceability Template"**: such as a structured, electronic file that accompanies the LLP throughout different phases of its lifecycle:



IATA's LLP Movement Traceability Template already provides a structured foundation for capturing LLP usage and transfer data. Building on this, the sector will gradually transition toward more sophisticated digital tools to ease (and standardize) transactions, such as '**digital passports / digital twins**', that offer secure, tamper-evident, real-time records. These digital solutions enhance traceability, minimize documentation discrepancies, and help mitigate the risk of unapproved parts entering the system. By establishing structured digital records at the point of manufacture and maintaining them throughout the LLPs lifecycle, the industry can strengthen regulatory compliance, streamline LLP transitions, and improve both asset value and supply chain resilience.

Note: While the 'digital twin' system is a recommended practice to enhance efficiency, other formats of existing record-keeping remain acceptable for the transfer of LLPs.

6. Regulatory & GM Source Documentation

This section lists the key regulatory and industry sources referenced in the development of this guidance. These materials form the foundation for the principles and practices recommended for life-limited part (LLP) traceability and documentation. Users are advised to verify that they are referring to the latest revision or amendment of each document as applicable.

6.1. Regulatory Sources

EASA Regulations and Guidance Material

- Regulation (EU) No 1321/2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances
- Annex I (Part M), in particular M.A.305 Subpart C and CAMO.A.315
- Annex II (Part 145)
- AMC/GM to Part M and Part 145
- Guidelines on the Use of Electronic Documents, Records and Signatures - Issue 1

FAA Regulations and Guidance Material

General/Private Aviation / Owner-Operator

- 14 CFR Part 43, §43.9 - Maintenance record entries
- 14 CFR Part 43, §43.10 - Disposition of life-limited aircraft parts
- 14 CFR Part 91, §91.417 - Maintenance records
- FAA Advisory Circular AC 43-9D - Maintenance Records and FAA Form 8130-3 Return to Service

Air Carrier / Transport Category

- 14 CFR Part 121, §121.380 — Maintenance recording requirements
- 14 CFR Part 121, Subpart L — Maintenance, Preventive Maintenance and Alterations
- 14 CFR Part 135, §135.439 — Maintenance recording requirements
- FAA Advisory Circular AC 120-16G — Air Carrier Maintenance Programs
- FAA Advisory Circular AC 120-17B - Reliability Program Methods

Parts and Maintenance Approval

- 14 CFR Part 21, §21.303 - PMA Authorization
- FAA Advisory Circular AC 20-154A - Guide for Developing a Receiving Inspection System for Aircraft Parts and Materials
- FAA-EASA TIP Revision 7.1 - Mutual Acceptance of PMA Parts
- FAA Advisory Circular AC 120-78B - Electronic Signatures, Electronic Recordkeeping, and Electronic Manuals
- FAA Order 8130.21J - Completion of FAA Form 8130-3

Transport Canada (TCCA) Regulations and Guidance Material

- CAR Part V, Standard 571 - Maintenance, in particular §571.09 Installation and Disposal of Life-Limited Parts
- CAR Standard 625 - Aircraft Equipment and Maintenance Standard



- Transport Canada Advisory Circular AC 605-002 - Reliability Programs
- Transport Canada AC No. 571-024 - Documentation Required for the Installation of Parts onto Canadian Registered Aircraft

CAAC (China) Regulations and Guidance Material

- CCAR-43 - Maintenance and Modification of Aircraft
- CCAR-121 - Operating Requirements
- CCAR-145 - Certification Rules on Civil Aircraft Maintenance Organizations

ANAC (Brazil) Regulations and Guidance Material

- RBAC 43 - Maintenance and Modification of Aircraft
- RBAC 121 - Operating Requirements for Air Carriers
- RBAC 145 - Certification of Maintenance Organizations

ICAO

- ICAO Annex 6, Part I - Operation of Aircraft, Chapter 8 (Aeroplane Maintenance)
- ICAO Annex 8 - Airworthiness of Aircraft, Part II, Chapter 4 (Continuing Airworthiness)
- ICAO Doc 9760 - Airworthiness Manual

6.2. Industry Frameworks & Guidance

IATA

- IATA Guidance Material and Best Practices for Aircraft Leases (2017 - updated 2026)
- IATA Guidance Material & Best Practice for LLP Traceability, Edition 2

6.3. Authority Clarification Regarding LLP Traceability Supporting Documentation

FAA Letter on Determining Life Status of Life-Limited Parts

The FAA has addressed the topic of life-limited part (LLP) traceability in advisory circular material and legal interpretations, clarifying that while accurate life status must be demonstrated, full back-to-birth documentation is not required to determine LLP current status. The following extract reflects this position:

"The regulations do not require back to birth records in order to determine the life status of life-limited parts provided that the operator can determine the part's life status with sufficient certainty using available documentation"

EASA Clarification on LLP Traceability Documentation Requirements

Similarly, EASA has addressed life-limited part (LLP) traceability in its publicly available Frequently Asked Questions (FAQ) platform, offering clarification on documentation expectations and the interpretation of applicable recordkeeping requirements:



"The term "back to birth" is not used in European regulations. The requirements that apply to a life-limited part or a service life-limited component are stated in M.A.305 (d)&(e). All detailed maintenance records of a maintenance action (e.g. a restoration) must be kept until another maintenance action equivalent in scope (another restoration) is done, but never less than 36 months. Keep in mind that:

- *a life-limited part or service life-limited component log card must be kept with all the relevant information, so the action should be recorded there, and*
- *the records showing compliance with other requirements stated in M.A.305, e.g. an airworthiness directive, or any other information that could be affecting the configuration of the aircraft, must be retained too."*

6.4. Release Standards

FAA and EASA Authorized Release Certificate Standards

-
- Commission Regulation (EU) No 1321/2014, as amended, Annex I (Part-M), Appendix II — Authorised Release Certificate — EASA Form 1 (maintenance purposes).
- Commission Regulation (EU) No 748/2012, as amended, Annex I (Part 21), Appendix I — Authorised Release Certificate — EASA Form 1 (production purposes).
- FAA Order 8130.21J – Completion of FAA Form 8130-3 under Part 21.
- AC 43-9D Maintenance Records and FAA Form 8130-3 Return to Service.

7. Operational and Redelivery Documentation Requirements

This section provides guidance on the documentation required to demonstrate the continuing airworthiness of life-limited parts (LLPs) and time-controlled components (TCCs) during aircraft operation, redelivery, or operator transfer. It supports compliance with applicable airworthiness regulations and maintenance program requirements, ensuring that the correct documentation is available and properly transferred whenever a part or assembly is removed, replaced, or transferred. For context on the terminology used in this section and its alignment with applicable regulatory frameworks, refer to [Section 2](#).

7.1. Time Controlled Components (Non-LLP Items)

Time Controlled Components (TCCs) are aircraft parts that require periodic maintenance based on either fixed intervals or monitored performance parameters, but do not fall under the category of Life-Limited Parts (LLPs). The control methods for these components are defined in the approved Maintenance Review Board Report (MRBR) or other applicable Instructions for Continued Airworthiness (ICA) issued by the Type Certificate holder. While implementation may vary between operators depending on their approved Aircraft Maintenance Programs (AMPs), the underlying requirements are based on these sources and must be approved by the competent authority.

The term “Time Controlled Component (TCC)” refers to ‘Hard Time’ and ‘On-Condition’ components. The primary maintenance processes for TCCs are:

Hard Time

A preventive maintenance process where known degradation is managed through scheduled tasks performed at defined intervals (e.g. calendar time, flight hours or cycles). The purpose is to restore the component’s airworthiness before its safety or function declines.

On-Condition

This maintenance strategy involves scheduled inspections or functional checks of components to assess their serviceability. Corrective action, such as removal or repair, is performed only when defined criteria reveal performance degradation that may compromise airworthiness, reliability, or operational capability.

Condition Monitoring

This process monitors key performance parameters, such as vibration levels, temperature, oil consumption, or pressure trends, over time to detect indications of potential degradation. Maintenance is performed only if data trends suggest a developing issue. This approach is commonly implemented as part of a reliability program.

Regulatory Requirement

The AMP must clearly identify the maintenance tasks applicable to each component whether HT or OC, based on the Instructions for Continued Airworthiness (ICAs), and describe how compliance with these tasks is monitored. Where tasks are controlled at the aircraft level (e.g., LDND, task card level), the related documentation must still provide traceability at the component level.¹²

The aircraft continuing airworthiness records shall include the current status of:

- compliance with the AMP / Maintenance Planning Document (MPD), developed from the MRBR and the ICAs

¹² GM M.A.305

- the CRS and Detailed Maintenance Records covering all scheduled and unscheduled work performed, retained for at least 36 months or until superseded

An EASA Form 1 or equivalent is not required to be kept for the 'condition monitored' components, unless this is the means to fulfil another requirement (e.g. demonstration of AD compliance).

7.2. Operator-to-Operator Transfer

In accordance with applicable continuing airworthiness regulations such as EASA M.A.305 and FAA 14 CFR 91.417; when an aircraft is transferred between operators, the releasing operator is responsible for supplying a complete and accurate set of continuing airworthiness records for all installed life-limited parts (LLPs). These records must enable the receiving operator to demonstrate ongoing compliance with the approved Aircraft Maintenance Program (AMP) and relevant regulatory obligations. Documentation should include the current LLP status, complete in-service history for each part, and up-to-date records verifying compliance with applicable Airworthiness Directives (ADs), Service Bulletins (SBs), repairs, and both manufacturer and non-manufacturer modifications, as approved by the competent authority.

The end-to-end traceability and handover process is illustrated in Section 2: LLP Management – During Operator In-Service Period (Flow Chart A).

7.3. LLP Off-Wing Maintenance

When LLPs undergo off-wing maintenance at an appropriately approved organization (e.g. Part-145 AMO or FAA-certified repair station), documentation must be available to demonstrate continued compliance with airworthiness requirements. This documentation must support the determination of continued airworthiness, installation eligibility, and confirm the LLPs current status based on the part's operational life. This process also facilitates the correct update of the aircraft maintenance program (AMP) and associated tracking systems.

Refer to [Section 1.3, Flow Chart B: 'LLP Management – During AMO/MRO Off-Wing Maintenance'](#) for the industry framework for required documentation, and process flow.

7.4. Operator Documentation Formats

Continuing airworthiness records may be maintained in physical (paper-based), electronic, or hybrid formats, depending on the systems and processes in use.¹³

Retention of records should be done in one of the following formats:

- original paper document or electronic data (via an approved electronically signed form);
- a paper reproduction of a paper document (original or copy); or
- an electronic reproduction of electronic data (original or copy); or
- a printed reproduction of electronic data (original or copy); or
- an electronically digitized reproduction of a paper document (original or copy); or
- a microfilm or scanned reproduction copy of a paper document (original or copy).

Where IT systems are used to retain documents and data, it should be possible to print a paper version of the documents and data kept.

Physical (non-digitized) records:

¹³ AMC M.A.305(e)

All physical records should remain legible throughout the required retention period. Physical records on either paper or microfilm systems should use robust material, which can withstand normal handling, filing and ageing. They should be stored in a safe way with regard to damage, alteration and theft.

Both the EASA and the FAA provide further guidance for the acceptable use of electronic documentation in aviation. They establish that electronic documents and records are equivalent to paper-based records, provided they meet essential criteria such as authenticity, integrity, traceability, security, and readability throughout their retention period.¹⁴ ¹⁵ ICAO similarly addresses the acceptance of electronic aircraft maintenance records at the international level.¹⁶

Digitized records:

Digitized records may be created from a paper document (original or copy) or from electronic data. When created from a paper document:

- (1) the creation date of the digitized record should be stored with the digitized record;
- (2) it is advisable to create an individual digitized record for each document;
- (3) if an organization creates a large number of digitized records, the use of database technology should ease the future retrieval of the record; and
- (4) digitized records should be legible, including details such as, but not limited to, the date of signature, names, stamps, notes, or drawings.

¹⁴ EASA Guidelines on the Use of Electronic Documents, Records and Signatures – Issue 1.

¹⁵ FAA Advisory Circular AC 12078B - Electronic Signatures, Electronic Recordkeeping, and Electronic Manuals

¹⁶ ICAO Annex 6 - Operation of Aircraft, Part I, Attachment B, Chapter 7 - Electronic Aircraft Maintenance Records (EAMR) and Continuing Airworthiness Records

8. Definitions

Aircraft Part – is any part installed on, or intended to be installed on, an aircraft, including associated appliances, systems, accessories, components, modules, engines, and other equipment necessary for the safe operation of the aircraft. For the purposes of this document, aircraft parts are categorized as follows:

- **Life-Limited Parts (LLPs)** – subject to mandatory replacement based on certified life limits.
- **Time-Controlled Components (TCCs)** – subject to scheduled maintenance intervals defined by the applicable maintenance program or airworthiness data.
- **Other Parts** – not subject to specific airworthiness life or time limitations.

Airworthiness Limitation - is a mandatory element of the certificated type design of a product (aircraft, engine, or propeller). It specifies scheduled maintenance tasks and part replacement limits that must be complied with to ensure continued conformity with the approved type design. These limitations are approved and mandated by the authority and are referenced within the Instructions for Continued Airworthiness (ICA), as identified in the applicable Type Certificate Data Sheet (TCDS). They include, among other items, the life limits for Life-Limited Parts (LLPs) and other essential maintenance intervals required to maintain the continued airworthiness of the product.

Authorized Airworthiness Entity (AAE) - for the purpose of this guidance, the AAE refers to any authorized person or organization, whether it be an operator, MRO, or third-party service provider, responsible for the management of continuing airworthiness and records for aircraft and components. The term is used to provide a globally applicable reference for the party accountable for airworthiness oversight, including traceability and documentation of life-limited parts. Approval to perform maintenance and/or manage continuing airworthiness responsibilities granted by the relevant competent authority constitutes recognition of the person or organization as an Authorized Airworthiness Entity (AAE) for this purpose. Typical examples of an AAE: CAMO / DAR / 14 CFR Part 145 / EASA Part-145.

Current Status - refers to the data which accurately establishes the level of compliance of an aircraft, engine, propeller or component thereof, with a requirement.

- The 'current status' when referring to components of life-limited parts should indicate, for each affected part, the life limitation, the total life accumulated in any applicable parameter (as appropriate) and the remaining life in any applicable parameter before the life limitation is reached.
- The 'current status' when referring to Time Controlled components refers to the current status of compliance with the required periodic maintenance task(s) from the maintenance schedule of the aircraft maintenance program specific to the time-controlled components. It should include the life accumulated by the affected components in the applicable parameter, as appropriate, since the last accomplishment of scheduled maintenance specified in the maintenance schedule of the aircraft maintenance program. Any action that alters the periodicity of the maintenance task(s) or changes the parameter of this periodicity should be recorded.

Current Status Confirmation (CSC) - refers to the documented evidence that establishes the airworthiness status of a Life-Limited Part (LLP). It consists of a current status (e.g. total time and cycles since new or overhaul, life-limiting factors), supported by an In-Service History Record. Together, these records establish traceability, demonstrate compliance with applicable Airworthiness Directives (ADs), modifications, and repairs, and confirm the part's status and eligibility for continued service. Current status confirmation is verified by the AAE.

Detailed maintenance records - refers to those records required to be kept by the person or organization responsible for the aircraft continuing airworthiness in order that they may be able to fulfil their obligations. These are only a part of the detailed maintenance records required to be kept by a maintenance organization. Maintenance organizations are required to retain all detailed records to demonstrate that they worked in compliance with their respective requirements and quality procedures. Not all records need to be transferred from the maintenance organization to the person or organization responsible for the aircraft continuing airworthiness unless they specifically contain information relevant to aircraft configuration and future maintenance. Thus, incoming certificates of conformity, batch number references and individual task card sign-offs verified by and/or generated by the maintenance organization are not required to be retained by the person or organization responsible. However, dimensional information contained in the task card sign-off or work pack may be requested by the AAE to verify and demonstrate the effectiveness of the aircraft maintenance program.

In-service history record - utilizes records from which the 'current status' of life-limited parts can be determined. The 'in-service history record' template could be adjusted to the relevant characteristics of the life-limited part, e.g. an engine disk being different from a fire extinguisher squib or landing gear sliding tube. Such records document each time a life-limited part is placed in service or removed from service. They should clearly:

- (1) identify the part by its part number and serial number,
- (2) show the date of installation and removal (i.e. date on/date off),
- (3) show the details of the installation and removal (i.e. type, serial number (S/N), weight variant (WV), thrust rating, as appropriate, of the aircraft, engine, engine module, or propeller) at installation and removal of the part when this is necessary to appropriately control the life limitation.
- (4) Show the total in-service life accumulated in any applicable parameter, as appropriate, corresponding to the dates of installation and removal of the part.
- (5) Any other events that would affect the life limitation, such as an embodied modification (in accordance with airworthiness directives, service bulletins or any product improvements) that affects the life limitation or changes the limitation parameter, should also be included in the in-service history record. Not all modifications would necessarily be pertinent to the life limitation of the component. Additionally, if a parameter is not relevant to the life of the part, then that parameter does not need to be recorded.

Life Limited Part (LLP) - is a part for which the maintenance schedule of the aircraft maintenance program (AMP) requires the permanent removal from service when, or before, the specified mandatory life limitation is reached.

Time-Controlled Components – Relates to any component for which the Maintenance Planning Document (MPD), developed from the MRBR and the ICAs issued by the (S)TC holder, requires periodic removal for maintenance. Such maintenance, performed by an appropriately approved organization, may involve restoring the component to a specified standard, replacing sub-components, or inspecting and testing the component's performance. These tasks are triggered after a service period controlled at the component level in accordance with the applicable maintenance requirements defined in parameters such as flight hours, cycles, or calendar time.



Appendix 1: Incident/Accident Clearance Statement

Aircraft:

(ON COMPANY LETTERHEAD)

Date _____

Incident/Accident Clearance Statement

To Whom It May Concern:

Aircraft [***enter registration***], details of which are specified below, has been operated by [***insert company name***] during the period from [***enter delivery date***] to [***enter redelivery date***]. The aircraft has a valid Certificate of Airworthiness from [***insert country of registration***] as of the date of this statement.

Type Certified Product details as of date of this statement;

Description*	Model / Series	Serial No.	TSN	CSN
Aircraft				
Engine				
Engine				
Propeller				
Propeller				

***Note:** including all parts and sub-assemblies installed thereon.

I hereby certify that, to the best of my knowledge, during the period stated above:

- The Type Certified Product(s) listed above have not been;
 - damaged during, or identified as the root cause of, a reportable incident or accident as defined by Annex 13 to the Chicago Convention, or
 - subjected to severe stress or heat (such as in a major engine failure, accident, or fire) or has been submersed in salt water,unless its airworthiness status was re-established by an approved maintenance organisation in accordance with the applicable airworthiness regulations and instructions of the type certificate holder and/or supplemental type certificate holder, and supported by an authorised airworthiness release certificate.
- No part has been installed on the aircraft which was obtained from a military source or was previously fitted to a state aircraft as deemed by Article 3 of the Chicago Convention.

Authorised Airline Representative

Signature: _____

Name: _____

Position: _____

Note: Please see also the Guidelines for understanding the Incident / Accident Clearance Statement (ICS) associated with this form.

September 2026



Engine:

(ON COMPANY LETTERHEAD)

Date

Incident/Accident Clearance Statement

To Whom It May Concern:

Engine serial number *[insert ESN]*, details of which are specified below, has been operated by *[insert company name]* during the period from *[insert delivery date]* to *[insert redelivery date]*.

Type Certified Product level details as of date of this statement;

Description*	Model / Series	Serial No.	TSN	CSN
Engine				

**Note: including all parts and sub-assemblies installed thereon*

I hereby certify that, to the best of my knowledge, during the period stated above:

1. The engine listed above has not been;
 - a. damaged during, or identified as the root cause of, a reportable incident or accident as defined by Annex 13 to the Chicago Convention, or
 - b. subjected to severe stress or heat (such as in a major engine failure, accident, or fire) or has been submersed in salt water,unless its airworthiness status was re-established by an approved maintenance organisation in accordance with the applicable airworthiness regulations and instructions of the type certificate holder, and supported by an authorised airworthiness release certificate.
2. No part has been installed on the engine which was obtained from a military source or was previously fitted to a state aircraft as deemed by Article 3 of the Chicago Convention.

Authorised Airline Representative Signature:

Name: _____

Position: _____

Note: Please see also the Guidelines for understanding the Incident / Accident Clearance Statement (ICS) associated with this form.

September 2026

Guidelines:

Incident / Accident Clearance Statement (ICS) Guidelines and Background Information

The purpose of this incident/accident clearance statement is to remove the focus from whether or not an aircraft/engine/propeller has been subjected to an accident or incident as was required by the original NIS, and to instead declare that the Type Certified Product has been deemed acceptable for continued use. For historical context; the ICS simply serves as a means of 'commercial comfort' for high value (Type Certified Product level) assets.

Note: For the avoidance of doubt, an ICS (or formerly NIS) is **not** required for airworthiness or commercial purposes when transferring or selling parts (e.g. landing gear assemblies or parts / engine modules or engine parts etc.) removed from Type Certified Products.

The statement in paragraph 1 of the ICS provides confirmation that irrespective of the event the Type Certified Product has been subjected to, its airworthiness has been re-established by an approved maintenance organisation in accordance with the applicable airworthiness regulations and instructions of the type certificate holder and/or supplemental type certificate holder (aircraft only). The reason for changing focus is that the ICAO definitions of accident and incident (reference Chapter 1 'Definitions' of Annex 13 – 'Aircraft Accident and Incident Investigation' to the Chicago Convention) do not take into account the relative nature of the event and its direct impact on the Type Certified Product. Specifically with regard to the definition of incident, it is highly subjective and subject to various interpretations by different regulatory authorities as to what affects or could affect the safety of operation.

While the ICS may have been used historically to list parts (e.g. Landing Gear) other than the intended Type Certified (TC) Product level items, these parts do not need to be listed in the table for the purpose of the ICS declaration. The status of an aircraft part can only be verified through the applicable Continuing Airworthiness Records, which provide the required; current status, continuity, traceability and retained maintenance history of the part. An ICS declaration is not an approved continuing airworthiness document and therefore cannot be relied upon as evidence of the part's airworthiness or installation status.

The statement in paragraph 2 provides additional confirmation, now customary in the industry that no parts have been obtained from a military source. Paragraph 2 also provides a statement regarding parts on state aircraft, considered appropriate because of industry requests for clarification regarding government use. Article 3 'Civil and state aircraft' of the Chicago Convention states that military, customs and police aircraft are deemed to be "state" aircraft. These aircraft are not placed on the civil register, therefore are not regulated by the associated national civil aviation authority in accordance with ICAO Standards & Recommended Practices (SARPs). For the purposes of this declaration; parts fitted to an aircraft that has transferred from a state to a civil register, may require special evaluation prior to regaining their status of being civil aircraft parts, the rationale being that the provenance of these parts, while on a state register may not be verifiable. While aircraft on the civil register are regularly contracted by governments for state business, because the operation occurs under civil rules and the aircraft remains on the civil register during the period of operation, parts from such an aircraft are considered to be civil aircraft parts, therefore reference is made to state rather than government use.

This document is intended to act as an industry acceptable common standard having relevance for the requirements of the commercial aviation industry. Application and use of this document commenced in late 2014 and is not intended to apply retrospectively, therefore previously issued incident / accident statements should retain their acceptability for historical reference. It should be noted that the ICS for the most recent period of operation supersedes previous ICSs, as it clearly declares that the Type Certified Product has been deemed acceptable for continued use (thereby deeming associated historical ICSs obsolete). This document will be subject to periodic review and update, with the first review expected to take place in early 2028.

Two document templates have been designed, one to cater for aircraft, the other for engines.

September 2026



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