International Civil Aviation Organization

MIDANPIRG/23 & RASG-MID/13 Meetings

(Cairo, Egypt, 14 – 18 June 2026)

Agenda Item 4.3: Other Emerging Safety Matters

INCLUSION OF THE APPLICABLE TCDS REFERENCE ON AIRCRAFT IDENTIFICATION PLATES

(Presented by Saudi Arabia/General Authority of Civil Aviation)

SUMMARY

This paper proposes an enhancement to the aircraft identification plate to include the Type Certificate Data Sheet (TCDS) number and the State to which the aircraft conforms, providing an additional layer of protection to minimize the risk of using incorrect manuals during maintenance, inspection, and Certificate of Airworthiness (C of A) renewal. The identification plate may be updated when an aircraft is registered in a different State that requires conformity to a different TCDS. This proposal will not impact on the existing aircraft data plate. The proposed enhancement improves traceability and supports regulatory compliance throughout the aircraft's operational life.
Action by the meeting is at paragraph 5.

REFERENCES

- ICAO Annex 7 — Aircraft Nationality and Registration Marks (paragraph 9)
- ICAO Annex 8 — Airworthiness of Aircraft
- ICAO Doc 9760 — Airworthiness Manual
- ICAO Doc 10004 — Global Aviation Safety Plan (GASP) 2026–2028 Edition
- MID Regional Aviation Safety Plan (MID-RASP) 2023–2025

1. INTRODUCTION

1.1 Under Annex 7, paragraph 9, the aircraft identification plate is required to be inscribed with the nationality or common mark and the registration mark, on fireproof material, and secured near the main entrance.

1.2 Defining the relevant TCDS number and its National Aviation Authority (NAA) will indicate the applicable certification basis and airworthiness standards for an aircraft, including its configuration, operating limitations, and the issuance of applicable Airworthiness Directives (ADs) and continuing airworthiness obligations.

1.3 The data plate is inscribed once at manufacture, and the information it carries is static. However, the identification plate may change during the aircraft's life for example, when the State of Registry, acting as the validating authority, has its own TCDS. In such cases, the data plate no longer reflects the TCDS to which the aircraft conforms.

2. ISSUE AND SAFETY CONCERN

2.1 When the data plate does not reflect the TCDS to which the aircraft conforms, authorities, operators, inspectors, and maintenance personnel may face uncertainty about which certification basis applies. This uncertainty affects several critical functions:

a) Airworthiness Directives - issued against specific TCDS numbers; the applicable AD list depends on the operative TCDS.
b) Maintenance procedures, repair limits and inspection programs - referenced to the TC and its approved data.
c) Configuration management - including MMEL applicability and the Aircraft Flight Manual baseline.
d) Continuing-airworthiness oversight by the State of Registry.
e) determining the eligibility of implement major design change / major repair design.

2.2 The most direct safety consequence is the risk of misapplied ADs. While the certification basis to which the aircraft conforms (i.e., complies with a specific TCDS) is authoritatively recorded in the Certificate of Airworthiness and the continuing airworthiness records, these documents are not present on the aircraft and are not immediately accessible during ramp inspections, foreign-State inspections, or unscheduled maintenance away from base.

3. ILLUSTRATIVE EXAMPLE

3.1 An Airbus A320-family aircraft may be manufactured in the European Union and conform to the EASA Type Certificate, then sold to a United States operator and registered with the FAA (where the aircraft complies with the FAA-validated TCDS) and subsequently transferred to a MID region operator applying EASA-aligned requirements. The data plate, inscribed at manufacture, remains unchanged throughout.

Stage	State of Registry	Operative TCDS	Data plate inscription
Manufactured	EU State	EASA.A.064	EASA.A.064
Sold to US operator	United States (FAA)	FAA A28NM	EASA.A.064 (unchanged)
Sold to MID-Region operator	MID State (EASA-aligned)	EASA.A.064	EASA.A.064 (unchanged)

3.2 An inspector or technician examining the aircraft has no immediate, on-board indication of the currently operative TCDS. This is not a hypothetical edge case: it is a routine consequence of normal aircraft sales and lease activity in the MID Region and globally.

4. PROPOSED ENHANCEMENT

4.1 It is proposed that the aircraft identification plate include, in addition to the minimum content required by Annex 7, paragraph 9, a reference to the TCDS to which the aircraft conforms and its issuing or validating authority.

4.2 TCDS reference field on the identification plate (or on an adjacent supplementary plate), updated by the State of Registry at the moment of registration.

4.3 This approach preserves the legal status of the existing identification plate, places the burden of accurate operative-TCDS information on the State of Registry, and provides immediate on-aircraft visibility for inspectors, operators and maintenance personnel.

4.4 The proposal aligns with the GASP 2026–2028 Organizational Challenges on effective safety oversight and continuing airworthiness, and supports the MID-RASP in advancing regional safety-oversight maturity.

5. ACTION BY THE MEETING

5.1 The meeting is invited to:

a) Take note of the working paper content;

b) Endorse the principle that the aircraft identification plate should reflect the TCDS to which the aircraft conforms under its current State of Registry,

c) task Safety Enhancement Implementation Group SEIG to develop the topic further, in coordination with the ICAO MID Office, including consideration of a candidate Safety Enhancement Initiative (SEI) for the next MID-RASP edition; and

d) request progress reporting at the next SEIG meeting and at MIDANPIRG/24 & RASG-MID/14.

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