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The Official Guide to Aircraft Registration 2024

CorporateJetInvestor

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Quick Reference Country Data

Aruba

Region: The Kingdom of Aruba **Prefix:** P4 **Location:** Oranjestad-Reina FL, 20 km in Oranjestad, Aruba
Country Status: Autonomous country within the Kingdom of the Netherlands

Aircraft
Weight Restrictions: None
Maximum Age: None
Aircraft Type Restrictions: 3,700 kg and 5,700 kg limitations
Maximum age (aircraft manufactured after January 1st, 1990)
Aircraft type certificate: EASA, FAA, Transport Canada and Brazil
Exceptions: Aruban Exempt Company (in Dutch: Arubaanse Vrijgestelde Vennootschap; abbreviated as AVV in Dutch)

Operation
Private Use: Yes
Commercial Air Transport: Yes

Finance
Mortgage Permitted: Yes
Restriction Governing Mortgage Law: None
Priority Status: Not applicable as there is no right of priority in Aruba
Public Registration: Yes. The AVV (as defined above). Registration of the mortgage in the AVV is perfective requirement under Aruban law. The AVV is not a public registration system. Registration of the mortgage in the AVV is not required for the mortgage to be valid.
Restrictions: Aruba has not ratified the Cape Town convention, but it has implemented international pursuant to the Cape Town Convention via the registration in the International Registry, on the condition that other international contracting parties have also implemented the Cape Town Convention.
Aircraft Type Restrictions: Aruban Exempt Company (in Dutch: Aruba Vrijgestelde Vennootschap; abbreviated as AVV). (This can be found on our website)
Cape Town: Yes, in 2009. We were the first offshore jurisdiction to ratify the Cape Town Convention.

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Austria

Region: Austria Czech Zvolen Czech Zvolen **Prefix:** OE **Location:** Austria
Location Austria **Country Status:** Republic, 20 Member

Aircraft
Weight Restrictions: Yes
Maximum Age: None
Aircraft Type Restrictions: EASA
Typical Structure: N/A

Operation
Private Use: Yes (ICAO aircraft in qualified
Commercial Air Transport: Yes (ICAO aircraft in qualified)

Finance
Mortgage Permitted: Yes
Restriction Governing Mortgage Law: Only Civil law mortgage (Dutch legal entities)
Priority Status: Not applicable
Public Registration: Yes
Designation Power of Attorney: Yes
Cape Town: Yes

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Azerbaijan

Region: Azerbaijan Civil Aviation Agency under the Ministry of Digital Development and Transport of the Republic of Azerbaijan
Prefix: 4K **Location:** Baku Heydar Aliyev Baku, AZ1009, Republic of Azerbaijan **Country Status:** Republic

Aircraft
Weight Restrictions: None
Maximum Age: None
Aircraft Type: None
Typical Structure: None

Operation
Private Use: Aircraft can be operated by individuals and legal entities leasing an aircraft operator certificate issued for certain Ops. A person leasing an aircraft operator certificate issued for certain Ops. A person leasing an aircraft operator certificate issued for certain Ops. A person

Restriction Governing Mortgage Law: In general terms, the law of the Republic of Cyprus (the Law) prevents national mortgages on Cyprus Real property, such as a mortgage over a property in Cyprus, from being transferred to a non-Cypriot lender. However, there are exceptions to this rule, for example, if the transfer is made to a lender in Accession Member State or the Contracting Parties to the European Economic Area Agreement or Regarding the Accession of the Republic of Cyprus to the European Union and the Protocol 10 of the Accession Treaty of the Republic of Cyprus.

Priority Notice: Cyprus has established that the parties to any contract may choose any governing legislation. An retention and security payment is a requirement in Cyprus. Retention and security payment is a requirement in Cyprus. Retention and security payment is a requirement in Cyprus. Retention and security payment is a requirement in Cyprus.

Priority Notice: First in time, first in right.

Public Registries: Yes, there are public registries in Cyprus where the parties to a public deed (where a public notary is able to be present with registration carried out by the Public Registry of Immovable Property).

Designation Power of Attorney: Yes, A Cypriot mortgage may be charged by agreement between the parties to a document of the total amount.

Other: Cyprus has a Land Registry Office which is a public registry of immovable property. In the case of a Hellenic Law, upon the issue of a declaration of the sum of the mortgage, the Land Registry Office issues a certificate of ownership.

For description to take place, a document providing the charted mortgage must also be documented in a public deed format prepared by a Cyprus Bar Association member. The registration documents must be filed for registration at the Public Registry of Movable Property and at the Land Registry.

Case Texts: Yes

Croatia

Registry: Croatian Court of Land Registers, maintained by the Croatian Civil Aviation Agency (CCAA)
Prefix: Hr. Location: Europe Country: Croatia Republic, EU Member State

Aircraft

Weight Restrictions: None
Maximum Age: None, subject to airworthiness
Aircraft Type Certificate: EASA
Typical Structure: Limited liability company; company limited by shares.

Operation

Private Use: Yes
Commercial Air Transport: Yes.

Finance

Mortgage Possible? Yes, pledge over aircraft.
Restriction Governing Mortgage Law: The law of the country of registration shall be applied regarding ownership title and other rights in rem (including mortgages) on aircraft.
Priority Notice: Yes, The priority of a mortgage over aircraft is determined according to the date and time of the entry into the register of the Croatian Court of Land Registers of the registration of mortgage. Under Croatian law, it is possible to register the so called "note on priority order". Before the mortgage has been created by having the priority order registered, it is possible to reserve the priority.
Public Registries: Yes, the Croatian Court of Land Registers.
Designation Power of Attorney: Yes, but CPGN (on behalf of the owner) has the aircraft owner can do together the aircraft without the operator's consent. Power of attorney is revoked in time, and may be considered substituted in a lapse of certain period of time. A CPGN cannot be registered at the Croatian Civil Aircraft Registry.
Case Texts: Yes

Denmark

Registry: The Danish Aircraft Mortgages Register maintained by the Danish Civil Aviation and Railway Authority
Prefix: Dk Location: Europe Country: Denmark Kingdom of Denmark, EU Member State

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: EASA
Aircraft Operator: Aircraft operator, then we have to claim registered company. This year (2023), the Danish Civil Aviation and Railway Authority (the "Authority") has changed from aircraft operator to aircraft owner the requirement of "company" to "aircraft operator". The Aircraft Operator in Denmark is no longer required if the aircraft is already owned by citizens or companies of European Union the European Economic Area (provided that such citizens or companies are registered in the Danish Civil Aviation and Railway Authority's register of aircraft operators). The Danish Civil Aviation and Railway Authority is the country of the aircraft operator, typically by way of an Aviation Bill in agreement. When an owner intends to place an aircraft on Danish register without this being a "genuine connection" to Denmark, it is advisable to coordinate such with the Danish CAA to allow the Danish CAA to conclude the relevant aviation bill in agreement.

Operation

Private Use: Yes
Commercial Air Transport: Yes

Finance

Mortgage Possible? Yes, Cyprus Town mortgages. Local mortgage registration available only when aircraft does not qualify as Cyprus Town aircraft.
Restriction Governing Mortgage Law: No restriction
Priority Notice: Yes
Public Registries: Yes
Designation Power of Attorney: Yes, but it is not possible to register the Designation power of attorney with the Danish Aircraft Pushbutton Register and it will automatically be revoked in case of the power of attorney. Notifications are available upon request.
Case Texts: Yes, since February 1st 2016.

Estonia

Registry: Aircraft Register of the Estonian Transport Administration (TRAM)
Prefix: Es Location: Europe Country: Estonia Republic

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: EASA
Typical Structure: Limited liability company

Operation

Private Use: Yes
Commercial Air Transport: Yes

Finance

Mortgage Possible? Yes
Restriction Governing Mortgage Law: Mortgage shall be governed by Estonian law.
Priority Notice: Yes
Public Registries: Yes
Designation Power of Attorney: Yes, (Not necessary for designation by the owner)
Case Texts: Yes

Finland

Registry: Finnish Traffic Register (maintained by Finnish Transport and Communications Agency (Traficom))
Prefix: Oh Location: Europe Country: Finnish Republic

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: EASA. In order to be used for aviation, the aircraft must have a Certificate of Airworthiness or a permit to fly. To obtain a Certificate of Airworthiness, the aircraft must be type certificated and meet the requirements of airworthiness. Applicable aviation legislation, such as the Aviation Act (Finnish: Ilmailulaki), is used with Certificate of Airworthiness after it has been found airworthy. Furthermore, the aircraft must have an annual Airworthiness Review Certificate, issued by a competent authority.
Typical Structure: Both natural persons and legal entities can be registered as owner of an aircraft provided, they have domicile in the European Economic Area. If the place of domicile is other than Finland, it is also required that the aircraft's principal place of departure is in Finland. In that case, the owner must have a tax number in Finland and a representative in Finland.

For natural persons, Traficom may also register an aircraft with sufficient connection to Finland provided the owner, operator or possessor has a representative in Finland.

Operation

Private Use: Yes
Commercial Air Transport: Yes. Commercial flight operations include passenger, freight, and mail operations for income. Commercial flight operations using aircraft for income in the form of operations in accordance with EU OR. Operations in accordance with EU OR are subject to the requirement that the aircraft is in fact or operating license as well as a Certificate of Airworthiness, which includes the Airworthiness Review Certificate (AWC). The AWC may be granted by a Finnish Transport and Communications Management Unit (Finnish: Liikenteen ja viestinnän ylläpitoyksikkö, LVY) or by a Finnish Transport and Communications Agency (Traficom).

Finance

Mortgage Possible? Yes, an aircraft registered in Finland can be mortgaged and used as collateral in a debt. The debt instruments used for aircraft mortgages are commonly bearer bonds, which are used as security. Confirmation of an aircraft mortgage must be applied for in writing using the form intended for the purpose. The mortgage must be applied for by the owner of the aircraft or by the creditor. If the creditor is applying for the mortgage, written evidence of the claim is required.
The mortgage application must uniquely identify the mortgage object and the monetary recommended for the collateral of which the mortgage is confirmed. The mortgage application must also include information on the aircraft's owner, the aircraft's manufacturer, the aircraft's type, and the aircraft's serial number. In case of confirmation which is equivalent to Finnish Mortgage Certificate, the mortgage application must also include the mortgage remaining valid for an equal term the date of renewal.
Restriction Governing Mortgage Law: To be valid, mortgaging of an aircraft has to be conducted and registered in accordance with the Finnish provisions on aircraft mortgages. Laki (Aircraft Act, Finnish: Laki ilmailusta) (11/1936), as amended, and the Finnish Aviation Act (Finnish: Ilmailulaki) (1194/2009), as amended, regulate the aircraft mortgage.
Priority Notice: Priority is given when the registering body on either CRCJ or under Cyprus Town Convention. A lien does not grant priority status.
Public Registries: Yes. Traficom records a confirmation of the confirmation, renewal or discharge of an aircraft mortgage is both the debt instrument and the aircraft mortgage. The aircraft mortgage is recorded in the Finnish Aircraft Register, which is a public register.
Designation Power of Attorney: Yes, Ownership of an aircraft mortgage must be applied for in writing using a document intended for the purpose. Mortgages, which are the original bearer bill of exchange, are applied for discharge of a mortgage. The power of attorney and other document (for example, an extract from the commercial register) must be in the original or certified copy. Power of attorney is valid for a maximum of one year from the date when the application is submitted to the registrar.
Case Texts: Finland has not ratified the Cape Town Convention, but the LVL which Finnish is a member. It can accede to it.

France

Registry: France Prefix: F Location: Europe Country: France, Overseas states (example)

Aircraft

Weight Restrictions: None
Maximum Age: None, but aircraft has a valid - or qualified for a - Certificate of Airworthiness, but registration of older aircraft such as vintage aircraft may be subject to exceptions and to the Cape Town convention requirements
Aircraft Type Certificate: EASA
Typical Structure: Limited liability company; however, owner may be an EU or EEA individual or corporation, or if outside of EU/EEA, the aircraft must be leased to a French AOC holder.

Operation

Private Use: Yes
Commercial Air Transport: Yes.

Finance

Mortgage Possible? Yes
Restriction Governing Mortgage Law: Yes, mortgage should be governed by French law. Note: In addition that the mortgage should appoint a previous agent in France to receive the Cape Town's Deadline grants. Mark penalty.
Priority Notice: Yes
Public Registries: Yes
Designation Power of Attorney: Yes, Under French law, powers of attorney may be revoked at any time by the grantor. Moreover, the registry is a registry of aircraft mortgages, not a registry of aircraft. Mortgages are secured.
Case Texts: Signature not called

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Germany

Registry: Luftfahrzeugrolle (maintained by Luftfahrt-Bundesamt (LBA))
Prefix: D Location: Europe Country: Germany Federal Republic

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: EASA
Typical Structure: Owner registry. Operator must be a European person or entity.

Operation

Private Use: Yes
Commercial Air Transport: Yes.

Finance

Mortgage Possible? Registered liens are possible. They are recorded on a separate registry, (Register für Pfandrechte an Luftfahrzeugen) as a district court of Braunschweig (Amtsgericht Braunschweig).
Restriction Governing Mortgage Law: German law
Priority Notice: Yes
Public Registries: Yes
Designation Power of Attorney: None
Case Texts: Signature not called

Guernsey

Registry: GASA Guernsey Aircraft Registry Prefix: 2
Jurisdiction: Crown Dependency Location: Europe Country: Guernsey

Aircraft

Weight Restrictions: No maximum weight restriction. Minimum weight restriction is 750kg. For any aircraft under 1,750kg, the owner must be natural or legal person ordinarily resident or domiciled in the Bailiwick of Guernsey.
Maximum Age: No aircraft where in the best of Flight Safety Committee's opinion any aircraft constructed in the type registered is established as being more than 20 years old at the date of the application for registration.
Aircraft Type Certificate: EASA, CAA, FAA, JAA, JAR, JAR-VLA, Transport Canada
Typical Structure: Body corporate, registration by individual and unincorporated bodies is also permitted.

Operation

Private Use: Yes
Commercial Air Transport: Yes.

Finance

Mortgage Possible? Yes
Restriction Governing Mortgage Law: Yes
Priority Notice: Yes
Public Registries: Yes
Designation Power of Attorney: Yes
Case Texts: Yes

Hong Kong

Registry: The Civil Aviation Department (CAD) Prefix: B, H, K, N, X
Jurisdiction: Special Administrative Region of the People's Republic of China Location: Asia Country: Hong Kong

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: EASA
Typical Structure: Owner registry. Operator must be a European person or entity.

Operation

Private Use: Yes
Commercial Air Transport: Yes.

Finance

Mortgage Possible? Registered liens are possible. They are recorded on a separate registry, (Register für Pfandrechte an Luftfahrzeugen) as a district court of Braunschweig (Amtsgericht Braunschweig).
Restriction Governing Mortgage Law: German law
Priority Notice: Yes
Public Registries: Yes
Designation Power of Attorney: None
Case Texts: Signature not called

Hungary

Registry: Hungarian Aircraft Registry (owner registry, registration at among others, owner, operator and mortgagee)
Prefix: HA Location: Europe Country: Hungary Republic, EU Member State

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: Required
Typical Structure: None

Operation

Private Use: Yes, running and maintenance costs separate expense.
Commercial Air Transport: Yes, Air Operator Certificate required. Leasing requires separate licence. Acquisition of aircraft used primarily in international transport may be exempt from VAT
Other: Yes

Finance

Mortgage Possible? Yes, mortgage is possible. Mortgage over airline is registered in the Hungarian Aircraft Registry. Mortgage over engine is registered in the Hungarian Aircraft Register. Mortgage over spare parts is possible.
Restriction Governing Mortgage Law: Yes, Hungarian law shall governs to be recognized and enforced by Hungarian courts.
Priority Notice: Yes, Requirements are the same as for registration.
Public Registries: Yes, Requirements are the same as for registration.
Designation Power of Attorney: Yes, Common practice is the with the Hungarian Aviation Authority. Not registered.
Case Texts: Yes

Indonesia

Registry: Indonesia Prefix: PK Location: South East Asia Country: Indonesia Republic

Aircraft

Weight Restrictions: None
Maximum Age: No, depending on aircraft categories
Aircraft type certificate: Available. Prerequisite to issuance of Certificate of Airworthiness
Typical structure: None

Operation

Private Use: Yes
Commercial Air Transport: Yes.

Finance

Mortgage Possible? Aircraft mortgage is currently not applicable due to the absence of mortgage provisions under the prevailing Aviation Law. However, recordation on certain aircraft parts of the aircraft, e.g. engine or spare parts, is available by way of fiduciary security transfer.
Restriction Governing Mortgage Law: None
Priority Notice: None
Public Registries: None. Registration of aircraft not available in the Directorate General of Civil Aviation under the Ministry of Transportation, which is responsible for maintaining the official registry.
Designation Power of Attorney: Yes, Power of attorney, accordingly to Innovative Designation and Export Requires Authority (DERA).
Case Texts: Authorized aircraft mortgagees in Indonesia since February 24th, 2007, through Fiduciary Transfer of Title.

Israel

Registry: The Civil Aviation Authority of Israel (CAA) Prefix: 4X Location: MIDDLE EAST Country Name: Sovereign State

Aircraft

Weight Restrictions: None
Maximum Age: None

Aircraft type certificate: No
Typical structure: None

Operation

Private Use: Yes
Commercial Air Transport: Yes.

Finance

Mortgage Possible? Yes
Restriction Governing Mortgage Law: Subject to restrictions as per the Fourth Chapter of the Aviation Regulations (Aircraft Registration and Marking), 1736-1976.
Priority Notice: Yes
Public Registries: Yes, with the Registrar of Pledges (Unit of the Israeli Corporations Authority and the CAA).
Designation Power of Attorney: Original, notarized and apostilled copy to be submitted.
Case Texts: Yes

Iran

Registry: Civil Aviation Organization of Iran (CAO) which is affiliated with Ministry of Roads & Transportation
Prefix: EP Location: Asia Country: Iran (Islamic Republic)

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: Air Operator Certificate (AOC)
Typical Structure: Companies

Operation

Private Use: Yes
Commercial Air Transport: Yes.

Finance

Mortgage Possible? Yes
Restriction Governing Mortgage Law: Iran's Civil Aviation Law
Priority Notice: Yes, but this will need to be processed through courts of law with the CAO to be advised for more information and not a negotiable.
Public Registries: Through the aircraft register maintained by CAO.
Designation Power of Attorney: Not mandatory
Case Texts: Yes

Republic of Ireland

Registry: The Irish Aircraft Register maintained by the Irish Aviation Authority (the "IAA")
Prefix: EI or EJ Location: Europe Country: Eastern Dublin, Irishy State and EU Member State

Aircraft

Weight Restrictions: No restrictions
Maximum Age: None
Aircraft Type Certificate: EASA
Typical Structure: Limited liability company (Irish Aviation Authority ("IAA"))

Typical Structure: Limited liability company (Irish Aviation Authority ("IAA"))

Operation

Private Use: Yes, Private flights operate at lower regulatory cost than Commercial Air Transport ("CAT"), and there is no requirement for an air operator's certificate ("AOC") or a CAT operator's certificate ("CAT") for private operations. The aircraft owner and/or pilot is responsible for ensuring that the safety of those on board flights.
It is important to note that it is strictly forbidden for civil aviation flights to operate for any form of payment. It is permissible in certain circumstances for passengers to share the costs of a private flight, provided that the pilot is not receiving any form of remuneration. Cost sharing is permissible if the flight is a genuinely private flight.
The flight is considered a non-complex "light aeroplane or helicopter" in accordance with the applicable rules for non-commercial operations, subject to the following conditions:
1. The crew is of twenty-all the individuals on the flying.
2. Only the direct costs associated with one particular flight may be shared e.g. fuel, airfield charges, rental fee for an aircraft.
3. Passengers share the cost equally and on a specific e.g. the cost of keeping, maintaining, insuring, and operating the aircraft must not be borne/cross a cost sharing flight.
4. It is not permissible to pass the pilot or any other non-previous costs not directly associated with the private flights and
5. The number of persons sharing the direct costs of a specific private flight is strictly limited to a maximum of six persons.
The pilot must conduct the flight in accordance with the applicable regulation for non-commercial flights with light aircraft.
Flights which are not considered private flights and are therefore subject to the CAT regulations include: Flights where the pilot is a personal file, accident, flight with insurance flies to a specific destination, and flights with a commercial purpose.
Passengers should also be aware that the pilot may amend or cancel the flight any reason, including if the pilot is not satisfied with the Service Rights and Responsibilities of Passengers, Shippers and Consignees.
The pilot must comfortable to the direct costs of the flight prior to the commencement of the flight. The pilot must ensure that all participants have agreed to the proposed cost share arrangement. It is not conducted in accordance with CAT requirements.
Passengers should be aware that the pilot may amend or cancel the flight if the pilot is not satisfied with the Service Rights and Responsibilities of Passengers, Shippers and Consignees. Flights which are not considered private flights and are therefore subject to the CAT regulations include: Flights where the pilot is a personal file, accident, flight with insurance flies to a specific destination, and flights with a commercial purpose.
The pilot must comfortable to the direct costs of the flight prior to the commencement of the flight. The pilot must ensure that all participants have agreed to the proposed cost share arrangement. It is not conducted in accordance with CAT requirements.
Restriction Governing Mortgage Law: Ireland has not ratified the Cape Town Convention. Ireland's Civil Aviation Law requires that a pilot's notice of intent to operate a private flight must be submitted to the Irish Aviation Authority ("IAA") at least one calendar month before the flight. The IAA will then issue a "Letter of Authorisation" to the pilot, which will contain a unique identifier for the flight. The pilot is then required to provide the IAA with a "Flight Report" within 24 hours of the flight, which will contain information on the flight, including the number of passengers and the amount of fuel used.
Priority Notice: Priority is given when the registering body on either CRCJ or under Cape Town Convention. A lien does not grant priority status.
Public Registries: Yes
Designation Power of Attorney: Yes, A CPGN does not have to be governed by Irish law. It is legitimate for it, in Ireland, the registered owner of the aircraft, to appoint a CPGN.
An irrevocable designation and export requires authorisation ("IDERA") to be lodged with the IAA. An authorised party specified on a power to the designation of the aircraft. An aircraft owner, mortgagee or lessor can apply for the designation of the aircraft without the lessor's or operator's consent. The IDERA is valid for a period of one year, and it can be renewed for a further period of one year upon request. To take an aircraft outside Ireland, an Export Certificate of Airworthiness is issued and an IDERA must be requested from the IAA.
The registered owner of the aircraft must complete a Form EI or EJ application or change aircraft, which is available from the IAA. The registrar can also be registered as owner of the aircraft. Registration of a change of ownership of the aircraft is also required.
Technically an aircraft can now exist.
1. The aircraft's name, the aircraft's manufacturer, the aircraft's model and serial number. The letter must be signed by the owner.
2. If the registered owner is an individual, the individual signature.
3. If the registered owner is a company, the letter must be signed by a director (or an equivalent person) and
4. If the registered owner is a company, the letter must be signed by a director (or an equivalent person) of the company or the current company secretary (as per the current CRO print out).
5. If the registered owner is a company, the letter must be signed by a director (or an equivalent person) of the company or the current company secretary (as per the current CRO print out).
6. If the registered owner is a company, the letter must be signed by a director (or an equivalent person) of the company or the current company secretary (as per the current CRO print out).
7. Proof that the aircraft's Irish Flight Crew has been required (if applicable).
8. Proof that the aircraft's Irish Flight Crew has been required (if applicable).
9. If the aircraft is an aircraft for Operator Certificate (AOC), it must be removed from the AOC prior to deregistration.
10. All fees outstanding must be paid in full for the aircraft.
11. The aircraft must be in a condition that is suitable for the IAA to inspect it and to be removed.
In addition to the self-help remedy under Irish law, the owner will have the remedy available in under the Cape Town Convention, including taking possession of the aircraft without a court order and deregistering and exporting an aircraft by exercising its rights under an IDERA.
Designation Power of Attorney: Yes, Irish law does not require a power of attorney to be governed by Irish law. It is legitimate for it, in Ireland, the registered owner of the aircraft, to appoint a CPGN. The aircraft owner and/or pilot is responsible for ensuring that the safety of those on board flights.
The effectiveness of these actions will, therefore, be determined by general principles of enforceable rights. The governing law of the power will be in the jurisdiction in which the aircraft is located.
Case Texts: Yes, since July 9th, 2003

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Italy

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Jordan

Region: Arab National Region (associated with the Civil Aviation Regulation Committee)
Prefix TC: Jordan Civil Aviation Authority **Location:** Amman **Country Status:** Operational

Aircraft

Weight Restrictions: None
Maximum Age: None, however ESMC may assess the suitability of historic aircraft in accordance with a Certificate of Airworthiness or a case-by-case basis.
Aircraft Type Certificate: Yes
Typical Operators: Limited liability companies or private owners

Operation

Private Use: Yes
Commercial Air Transport: Yes

Finance

Mortgage Possible?: Yes
Restriction Governing Mortgage Law: An Italian law notarial mortgage deed is required to create the aircraft security.
Priority Notice: Yes
Public Registration: Yes, the Civil Aviation Authority available upon request.
Deregistration Allowance: Yes, but will have to provide an unit application.
Case Texts: Yes. Italy has signed but not ratified Cape Town set.

Jordan

Region: Arab National Region (associated with the Civil Aviation Regulation Committee)
Prefix TC: Jordan Civil Aviation Authority **Location:** Amman **Country Status:** Operational

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: Yes
Typical Operators: Limited liability companies

Operation

Private Use: Yes
Commercial Air Transport: Yes

Finance

Mortgage Possible?: Yes
Restriction Governing Mortgage Law: Yes
Priority Notice: Yes
Public Registration: Yes
Deregistration Allowance: Yes, in addition to EASA's in accordance with the Cape Town Convention and its Protocol.
Case Texts: Yes

Kenya

Region: Kenya Civil Aviation Authority **Prefix TC:** Location: Nairobi **Country Status:** Republic

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: Yes, EASA, FAA, TCCA, ANAC, TCA, CAA Israel, UK CAA
Typical Operators: Limited liability company

Operation

Private Use: Yes
Commercial Air Transport: Yes

Finance

Mortgage Possible?: Yes
Restriction Governing Mortgage Law: Yes
Priority Notice: Yes
Public Registration: Yes
Deregistration Allowance: Yes
Case Texts: Yes

Latvia

Region: The Civil Aviation Agency of Latvia (CAA)
Prefix TC: Location: Riga **Country Status:** Republic

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: Fixed-line certificate issued in a land cargo paper form
Aircraft Type Certificate contains: aircraft type, aircraft manufacturer, aircraft model, manufacturer's serial number, manufacturer's designation of aircraft, aircraft registration mark and address of registered owner, name and address of lessee, information on restrictions, authorisations and teachers for reasons of certificate.

Operation

Private Use: Yes
Commercial Air Transport: Yes

Finance

Mortgage Possible?: Yes
Restriction Governing Mortgage Law: Latvian law (the Commercial Pledge Law) for aircraft registered in Latvia.
Priority Notice: Yes, priority for an in the registered aircraft pledge mortgaged based on the Commercial Pledge Law.
Public Registration: Yes, the Civil Aviation Agency of Latvia (CAA) Aircraft Register.
Deregistration Allowance: Yes, however, Latvia has signed the Cape Town Convention and its Protocol. Since 1 September 2021 it is possible to issue and register an EASA airworthiness.
Latvia has signed the Cape Town Convention (CTC) and its Protocol on February 8th, 2011, the Convention and its Protocol (Protocol to the Convention on International Interests in Mobile Equipment as Applies to Aircraft Equipment) entered into force for Latvia on 1 September 2021.
Case Texts: Yes

Lithuania

Region: Civil Aviation Regime of the Republic of Lithuania
Prefix LT: Location: Europe **Country Status:** Republic

Aircraft

Weight Restrictions: Yes
Maximum Age: Yes
Aircraft Type Certificate: EASA
Typical Operators: LAR Eco LLC

Operation

Private Use: Yes, subject to regulatory obligations
Commercial Air Transport: Yes

Finance

Mortgage Possible?: Yes
Restriction Governing Mortgage Law: Yes
Priority Notice: Yes
Public Registration: Yes
Deregistration Allowance: Yes, (But not EASA)
Case Texts: Yes registered but not ratified by EU countries

Malaysia

Region: Civil Aviation Authority of Malaysia (CAAM) **Prefix 9M:** Location: Kuala **Country Status:** Sovereign State

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: CAAM Kuala issue aircraft certificate. It may also validate aircraft type certificate issued by FAA, EASA or any equivalent certifying authority handled in Kuala
Typical Operators: Owner based registry with non-citizen consent aircraft having to be based in a citizen (individual or company) in qualify for registration with CAAM

Operation

Private Use: Yes
Commercial Air Transport: Yes

Finance

Mortgage Possible?: Yes
Restriction Governing Mortgage Law: Yes
Priority Notice: Yes, Kuala Lumpur International Registry
Public Registration: Yes, with CAAM and the International Registry
Deregistration Allowance: Yes, the deregistration power of attorney document must be duly stamped and registered with the Courts in Malaysia.
Case Texts: Yes

Maldives

Region: Maldives Civil Aviation Authority **Prefix CAA:** Location: Male **Country Status:** Unitary state

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: Foreign Type Certificates are accepted as validation.
Typical Operators: Natural or legal persons

Operation

Private Use: Yes
Commercial Air Transport: Yes

Finance

Mortgage Possible?: Yes
Restriction Governing Mortgage Law: Yes
Priority Notice: Yes
Public Registration: Yes
Deregistration Allowance: Yes
Case Texts: Yes

Malta

Region: Malta Aircraft Register **Prefix 9H:** Location: Malta **Country Status:** Republic

Malta Aircraft Register (**Prefix 9H**) **Location: Malta** **Country Status: Republic**

The MCAA is the competent authority responsible for the Maltese Aircraft Register. The Malta Aircraft Register uses a single register system and is registered further below in an open registry. Most notably, Malta has also ratified the Cape Town Convention on October 16 2020 and the Protocol thereto on the Matters Specific to Aircraft Equipment. The Cape Town Convention and Aircraft Protocol Implementation Act (Malta) (Chapter 574 of the Laws of Malta) (the "Act") and its Regulations.

Aircraft

Weight Restrictions: In terms of weight restrictions for the purposes of registration, under the First Schedule of the MA (The Implementing Law) Respect Of The Cape Town Convention On International Interests In Mobile Equipment And The Aircraft Protocol Thereto) (Chapter 574 of the Laws of Malta) (the "Act") and its Regulations, the Malta Aircraft Register does not have any weight restrictions. However, as certified by the competent aviation authority in respect of the aircraft, the aircraft must be capable of being operated in accordance with the requirements of Annex 6 to the Chicago Convention on International Civil Aviation (Doc 9376) and the Malta Civil Aviation Regulations (Subsidiary Legislation 12.01 of the Laws of Malta) and shall not exceed the following limits:

(a) maximum take-off weight (MTOW) 2,000 kg;
(b) maximum seating capacity 19 passengers;
(c) maximum fitting out load (FOL) 1,000 kg;
(d) maximum ferry range 1,500 nautical miles;
(e) maximum cruising speed 250 knots calibrated airspeed (CAS);
(f) maximum operating altitude 25,000 feet;
(g) maximum payload 1,000 kg;
(h) maximum fuel capacity 1,000 kg;
(i) maximum fuel flow 300 kg per hour;
(j) maximum sound emissions 3 decibels below Chapter 3 of Annex 16 to the Chicago Convention on International Civil Aviation.

Maximum Age: Yes, but only applicable for the purposes of registration, under the First Schedule of the MA (The Implementing Law) Respect Of The Cape Town Convention On International Interests In Mobile Equipment And The Aircraft Protocol Thereto) (Chapter 574 of the Laws of Malta) (the "Act") and its Regulations, the Malta Aircraft Register does not have any age restrictions. However, as certified by the competent aviation authority in respect of the aircraft, the aircraft must be capable of being operated in accordance with the requirements of Annex 6 to the Chicago Convention on International Civil Aviation (Doc 9376) and the Malta Civil Aviation Regulations (Subsidiary Legislation 12.01 of the Laws of Malta) and shall not exceed the following limits:

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(d) maximum ferry range 1,500 nautical miles;
(e) maximum cruising speed 250 knots calibrated airspeed (CAS);
(f) maximum operating altitude 25,000 feet;
(g) maximum payload 1,000 kg;
(h) maximum fuel capacity 1,000 kg;
(i) maximum fuel flow 300 kg per hour;
(j) maximum sound emissions 3 decibels below Chapter 3 of Annex 16 to the Chicago Convention on International Civil Aviation.

Aircraft Type Certificate: The Aircraft Register of Malta is an open register. However, an owner can register an aircraft in Malta in the event that the aircraft is not being imported to operate in the owner and the operator are the same entity.
Aircraft Type Certificate issued by a recognised aviation authority in accordance with the Chicago Convention of Civil Aviation which is not transferable, and shall include name and address of the registered, the owner, address and ownership interests of the aircraft, in accordance with the laws of Malta.

Typical Operators: Natural or legal persons

Operation

As explained above, the National Aircraft Register is open but register and therefore it is usually the operator who registers the aircraft in the National Register of Aircraft. Operators can be natural persons or companies, or other legal entities.

In this respect there are some limitations also on the operator the aircraft, and the Act provides that the following persons shall not be eligible to register any aircraft whether it is used for private or otherwise in the National Aircraft Register:

(a) a person who is not a citizen of Malta;
(b) a citizen of Malta or a citizen of a Member State of the European Union or of an EEA State or Switzerland having a place of residence or business in Malta, the European Union, the EEA or Switzerland;
(c) a company or other legal entity which does not conform with the laws of Malta, of whether State of the European Union or of EEA State or Switzerland and having equal beneficially control determination and principal place of business in Malta, the European Union or an EEA State or Switzerland;
less than 50% of the underlying or beneficial owners and effectively controlled by the Government of Malta or by the Member State of the EU or by persons referred to in (b) or (c) above, or by nationals of such States or companies or other legal entities referred to in (c) above;
(d) if a natural person who is a citizen of a Member State or a company or other legal entity referred to in (c) above, the aircraft is not registered in a State qualified to register aircraft in consortium or one which is not used to provide or to facilitate services of a complex with a number of requirements as imposed by the competent authority;
(e) the owner of the aircraft who operates the aircraft, and
(f) the owner of the aircraft who operates the aircraft, or a person who has operated or managed or
(g) the operator of an aircraft under a contract of dry lease or charter or similar agreement which satisfies the conditions which may be prescribed and which is deemed to be an operator of an aircraft.

Private Use: It is possible for an aircraft and/or to be used for public purposes for hire private to be registered in Malta. In this case there will not be the requirement for the aircraft to be used for commercial purposes.

Commercial Air Transport: In an aircraft which is used for hire, for the exercise of public power of the aircraft, or for commercial purposes for the carriage of passengers or cargo in the aircraft on that flight, or (c) if any passenger or cargo are carried publicly in the aircraft on that flight, or (d) in an aircraft which is used for the purpose of aerial work, or (e) in an aircraft which is used for the purpose of training persons in the operation of aircraft, or (f) in an aircraft which is used for the purpose of training persons in the operation of other making or inspection or otherwise giving training or providing or test for any purpose whatsoever, or (g) in an aircraft which is used for the purpose of or ancillary to, for the exercise, in operation in commercial flight, the operator of an aircraft, or (h) in an aircraft which is used for the purpose of or ancillary to, for the exercise, in operation in commercial flight, the operator of an aircraft, or (i) in an aircraft which is used for the purpose of aerial work or training.

Finance

Mortgage Possible?: Aircraft purchases are typically financed through either:
- A third party bank on the aircraft owner, secured by a mortgage; or
- Leasing.

In a bank loan scenario, the bank provides the required funds and retains a mortgage over the aircraft as security for the loan. Aircraft mortgages are the latest type of encumbrance taken over an aircraft in Malta. Aircraft mortgages are provided as a statutory form that will typically refer to the underlying loan agreement between the parties.

Leasing is the second most common way to finance the aircraft purchase. In this scenario the owner of the aircraft (the lessor) retains ownership of the aircraft and leases it to the operator (the lessee) for a specified period of time in exchange for a series of payments. However, many states the security interest in such a lessor's aircraft title known as a conditional sale and a security interest in such a conditional sale is referred to the National Aircraft Register.

Restriction Governing Mortgage Law: Yes, the Maltese Aircraft Register uses an aircraft as a security interest in such a lessor's aircraft title known as a conditional sale and a security interest in such a conditional sale is referred to the National Aircraft Register.

Priority Notice: Yes

The priority of mortgages, maritime liens and other encumbrances

Any degree granted by the owner of the aircraft, whether attached to the aircraft or not and whether registered that as designated for one or the other of the following purposes, shall be deemed to be a mortgage on the aircraft and shall be registrable as such.

Malta does not have the mortgage in Spanish sense, which is a form of rights registered on the aircraft, that is the Maltese may not confuse the mortgage with the Spanish sense. Nevertheless, it is possible for the Maltese mortgage to also secure a foreign law mortgage and security agreement.

Malta has ratified the Cape Town Convention on October 16 2020, and the Convention and its Protocol thereto on the Matters Specific to Aircraft Equipment. Leasing is a form of rights registered on the aircraft, that is the Maltese may not confuse the mortgage with the Spanish sense. Nevertheless, it is possible for the Maltese mortgage to also secure a foreign law mortgage and security agreement.

Public Registration: Yes, the Maltese Aircraft Register is a public register, whereby it is possible to check what aircraft are registered in the Malta Aircraft Register.

Deregistration Allowance: Yes, deregistration. Deregistration and Export Request Authorisation (DERAL) is based in favour of the lessor or any secured creditor, and is a prerequisite for the issuance of an export certificate of airworthiness (EASA Form 15).

It is important to note that in order for an aircraft (DERAL) to be assigned and enforceable in favour of the lessor/creditor, it must be complied with any requirements required and be authorised and be not contrary of the registration or the aircraft owner.

Malta has ratified the Cape Town Convention on October 16 2020, and the Convention and its Protocol thereto on the DERAL should be reserved and deployed by Apache. For DERAL's issued outside of the European Union or the accompanied by sufficient evidence that the person signing the DERAL is an authorised signatory of the registered owner.

Case Texts: Yes, Malta has ratified the Cape Town Convention on October 16 2020, and the Convention and its Protocol thereto on Matters 1 February 2021. The Cape Town Convention has been implemented into Maltese law via the Act (Malta) (the Act) (Regulations (the) 2021.

Mauritius

Region: Department of Civil Aviation **Prefix 3B:** Location: Mauritius **Country Status:** Republic

Aircraft

Weight Restrictions: Yes
Maximum Age: No, subject to compliance with requirements
Aircraft Type Certificate: Type certificates have been accepted from authorities such as EASA/FAA/Transport Canada on normally accepted basis. Foreign Company limited by shares (supplied with a Global Business License to benefit from a tax favorable regime, where accepted).
Typical Operators: Yes

Operation

Private Use: Yes
Commercial Air Transport: Yes

Finance

Mortgage Possible?: Yes
Restriction Governing Mortgage Law: Yes
Priority Notice: Yes
Public Registration: Yes, the Register of Aircraft held by the Department of Civil Aviation and the Register of Aircraft Mortgages held by the Conservator of Mortgages.
Deregistration Allowance: Yes
Case Texts: Yes

Nepal

Region: Civil Aviation Authority of Nepal Aircraft Register
Prefix 9N: Location: Kathmandu **Country Status:** Independent Federal Democratic Republic

Aircraft

Weight Restrictions: None
Maximum Age: None
Fee Amount:
1) Registration fee: - In more than 10 years or completed 75% of its design economic life or 45,000 pressurization cycles, whichever is earlier
2) Registration fee: - Not more than 10 years old
Aircraft Type Certificate: Aircraft is not used that the operation of an aircraft that has reached more than half its economic design life shall depend upon the results of a structural integrity programme.
Typical Operators: Yes
(i) A type certificate issued by the State of Design;
(ii) A type certificate issued by the FAA
(iii) A type certificate issued by the EASA
(iv) A type certificate issued by the JCAB
(v) A type certificate issued by an ICAO contracting State Authority other than above, if the Design Approval Holder of the product can effectively demonstrate that the type certificate is issued in accordance with a bilateral airworthiness agreement.
Typical Operators: Private or public limited company

Operation

Private Use: Yes
Commercial Air Transport: Yes

Finance

Mortgage Possible?: Yes
Restriction Governing Mortgage Law: Yes
Priority Notice: Yes
Public Registration: Yes
Deregistration Allowance: Yes
Case Texts: Yes

Nigeria

Region: Nigeria Civil Aviation Authority **Prefix 5N:** Location: Abuja **Country Status:** Federal Republic

Aircraft

Weight Restrictions: Not applicable. The aircraft must, however, be within the prescribed legal weight limits.
Maximum Age: Where an aircraft is more than 20 years old and registered under the law of any other state, it will not be registered at the NCAA, unless it is accompanied by a report of a survey of the aircraft by a person approved for the purpose by the Authority and the report is satisfactory.
Aircraft Type Certificate:
- The type certificate issued by the country of the aircraft manufacturer;
- The type certificate issued or renewed on an airworthiness code recognized by the NCAA;
- Where the aircraft is not eligible for a type certificate under the airworthiness code recognized by the NCAA, a temporary limited airplane type certificate issued in accordance with the terms and conditions by the NCAA and has been issued to cover the proposed use of the aircraft. The proposed airworthiness code to be complied with any recommendations required by the NCAA, or upon acceptance of the type certificate by the NCAA, the NCAA may, prior to issue of a standard or special airworthiness certificate, require the operator to comply with such special conditions as the NCAA deems necessary for the safety of flight.

Typical Operators: Yes, but not required by Private Aircraft.

Individual citizen of another state who is lawfully admitted for permanent residence in Nigeria. (ii) a corporation lawfully organized and doing business under the laws of any state of Nigeria, or of any other state, of which the president and two-thirds of the officers and authorized thereof (or a Corporate person who has beyond the aircraft is a city of person described in (i) above).

Operation

Private Use: Yes
Commercial Air Transport: Yes

Finance

Mortgage Possible?: Yes, it is possible to create a mortgage over an aircraft operated in Nigeria.
Restriction Governing Mortgage Law: Yes, the Nigerian Law governs the creation of a valid mortgage. The applicable law will usually be that which is expressed to be chosen by the parties, provided such choice is not in the mortgage. Failing such agreement, the law which is most closely connected with the mortgage will be applicable.
Priority Notice: Yes, the Nigerian Law governs the creation, the registration, the priority of the mortgage and subsequently registered mortgage and mortgage. Under the law, registration of the mortgage with the Authority is a prerequisite for the mortgage to be enforceable against third parties.
Public Registration: Yes, the aircraft mortgage may be registered at the NCAA, or the NCAA is obliged to maintain a register of aircraft mortgages. A copy of the mortgage instrument or a sufficient extract thereof shall be produced to the NCAA for the purpose of the entry in the register. Under the law, the mortgage shall be deemed to be registered when the aircraft may be registered with the NCAA and the aircraft is not registered in any other country. The register for an aircraft mortgage is different from the aircraft register.
Deregistration Allowance: Yes, deregistration power of attorney, the application must be in writing, addressed to the director general of the NCAA accompanied by such particulars of aircraft as the Authority may reasonably require and shall contain the name and address of the aircraft owner or the lessee, aircraft registration and serial number, and proof of payment of the relevant fee(s) to the NCAA (we hope to determine whether registration should be permitted).
Case Texts: Yes, Nigeria has signed the Cape Town Convention on 16 November 2009 and ratified the Convention and its Protocol to the Deputy Director General, Aviation Technical Services, Nigeria Civil Aviation Authority, Nigeria. Nigeria has ratified Cape Town Convention and its Protocol Protocol Implementation Act 2009 (the "Act") and the Cape Town Convention and Aircraft Protocol (Implementation) Regulations 2009 (the "Regulations"). The Cape Town Convention and Aircraft Protocol (Implementation) Regulations 2009 (the "Regulations") (collectively, the "Cape Town Convention and Aircraft Protocol (Implementation) Regulations") (collectively, the CDER's signatories, CDER's Beneficiaries, which are entitled from the lessee/debtor/operator/customer/obligor/grantor/borrower/owner/mortgagor/charterer/operator/hirer/buyer/conditional seller/secured party/creditor/lessor/owner/trustee/beneficiary/trustee/beneficiary/trustee/beneficiary

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: Airworthiness Certificate
Typical Structure: Varied.

Operation

Private Use: Yes
Commercial Air Transport: Yes.

Finance

Mortgage Possible? Security Interest, with similar effects.
Restriction Governing Mortgage Law: Conflict of laws provisions apply.
Priority Notice: Yes
Public Registration: Yes, makes the recording enforceable *erga omnes*
Deregistration Power of Attorney: Yes, with similar effects to IDERA.
Cape Town: No.

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Romania

Registry: Romanian Civil Aircraft Register ("Romanian Unique Registration Register of Civil Aircraft") **Prefix:** YR **Location:** Europe **Country Status:** Unitary state

Aircraft

Weight Restrictions: All civil aircraft must be registered in the Civil Aircraft Register held by the Civil Aeronautical Authority (CAA), with the exception of non-motorised ultralight aircrafts and unmanned aircraft intended for 'open' and 'specific' operations, as defined in Commission Implementing Regulation (EU) 2019/947 of May 24th 2019, and for which European regulations do not require certification. Operational authorisation may be required depending on the weight and specifications of the unmanned aircraft.
Maximum Age: None. Airworthiness conditions apply.
Aircraft Type Certificate: EASA
Typical Structure: Owner or lessee of aircraft must be a private individual domiciled or permanently residing in an EU-member state or a private entity headquartered in an EU-member state.

Operation

Private Use: Yes
Commercial Air Transport: Yes

Finance

Mortgage Possible? Yes
Restriction Governing Mortgage Law: Mortgages (or equivalent security interests) are governed by the law of the country of aircraft registration.
Priority Notice: None. Rank of mortgage is primarily determined based on order of registration in the Register of Encumbrances held by the Romanian CAA. Same rule applies for facultative registration in the national database for registration of security interests (the National Registry of Publicity for Movable Property – RNPM).
Public Registration: Yes. Mortgages are registered in the Register of Encumbrances held by the Romanian CAA. Public registration in the National Registry of Publicity for Movable Property (RNPM) is also possible.
Deregistration Power of Attorney: Yes. However, if governed by Romanian law, the Deregistration Power of Attorney is revocable.
Cape Town: Yes.

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San Marino

Registry: San Marino Civil Aviation Authority
Prefix: T7- **Location:** Europe – (extra UE) **Country Status:** Republic

Aircraft

Weight Restrictions: None
Maximum Age: There is no maximum age restriction for aircraft, but for those aircraft more than 30 years since the date of manufacture, applicants must obtain a special permit from the director general of the CAA.
Aircraft Type Certificate: FAA, EASA, Transport Canada, UK CAA, ANAC
Typical Structure: Foreign company appointing a resident agent. Foreign trustee (under a trust structure) appointing a resident agent.

Operation

Private Use: Yes
Commercial Air Transport: Yes.

Finance

Mortgage Possible? Yes
Restriction Governing Mortgage Law: Notarised mortgage deed required.
Priority Notice: Yes
Public Registration: No. Title and lien search available.
Deregistration Power of Attorney: Yes.
Cape Town: Yes.

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South Korea

Registry: Civil Aircraft Register operated by the Office of Civil Aviation of the Ministry of Land, Infrastructure and Transport (MOLIT)
Prefix: HL- **Location:** Asia **Country Status:** Democratic Republic

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: The Ministry of Land, Infrastructure and Transport (MOLIT).
Typical Structure: Operator registry.

Operation

Private Use: Yes
Commercial Air Transport: Yes.

Finance

Mortgage Possible? Yes
Restriction Governing Mortgage Law: Aircraft mortgage agreement must be governed by Korean law and registered in the Korean aircraft register.
Priority Notice: No
Public Registration: Yes
Deregistration Power of Attorney: No
Cape Town: No.

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Spain

Registry: Spanish Aircraft Registry (AMR) and Movable Property Registry (MPR)
Prefix: EC- **Location:** Spain (Europe) **Country Status:** Sovereign State

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: EASA
Typical Structure: None.

Operation

Private Use: Yes
Commercial Air Transport: Yes.

Finance

Mortgage Possible? Yes
Restriction Governing Mortgage Law: Yes, under the Spanish Law on Chattel Mortgage of 1954.
Priority Notice: No
Public Registration: Yes, with the Spanish Movable Property Registry.
Deregistration Power of Attorney: Yes. IDERA according to the Cape Town Convention and its Protocol may be submitted.
Cape Town: Yes. Spain's accession to the Cape Town Convention (Official Journal of Spain of October 4th 2013). The signature of the supplementary Aircraft Protocol has been executed (Official Journal of Spain of February 1st 2016).

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Sweden

Registry: Swedish Civil Aircraft Register **Prefix:** SE- **Location:** Europe
Country Status: Monarchy, member state of European Union

Aircraft

Weight Restrictions: No
Maximum Age: No
Aircraft Type Certificate: EASA
Typical Structure: Individual or corporate body is acceptable.

Operation

Private Use: Yes
Commercial Air Transport: Yes

Finance

Mortgage Possible? Yes
Restriction Governing Mortgage Law: No
Priority Notice: Yes
Public Registration: Yes
Deregistration Power of Attorney: Yes
Cape Town: Yes.

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Switzerland

Registry: Swiss Aircraft Register maintained by the Swiss Federal Office of Civil Aviation (FOCA) **Prefix:** HB-
Location: Europe (Switzerland is not a member state of the European Union but member of EASA) **Country Status:** Confederation

Aircraft

Weight Restrictions: None
Maximum Age: None (but subject to airworthiness requirements)
Aircraft Type Certificate: EASA
Typical Structure: Swiss company or (subject to supply of aircraft to Swiss AOC operator) foreign company.

Operation

Private Use: Yes
Commercial Air Transport: Yes

Finance

Mortgage Possible? Yes
Restriction Governing Mortgage Law: Swiss law (as a rule)
Priority Notice: Not available
Public Registration: Yes
Deregistration Power of Attorney: Yes (with qualifications)
Cape Town: No.

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Turkey

Registry: Directorate General of Civil Aviation (DGCA) Civil Aircraft Registry **Prefix:** TC-
Location: Europe/Middle East **Country Status:** Republic

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: EASA, FAA, TCCN or ANAC
Typical Structure: Turkish citizens and legal entities – the majority of shareholders and directors of an aircraft owner legal entity must be Turkish citizens. Foreign owned aircraft may also be registered if the Aircraft is on long term lease to a Turkish citizen or legal entity.

Operation

Private Use: Yes
Commercial Air Transport: Yes

Finance

Mortgage Possible? Yes
Restriction Governing Mortgage Law: Mortgage agreement has to be governed by Turkish law.
Priority Notice: None
Public Registration: In order to be valid and enforceable, an aircraft mortgage has to be registered with the Civil Aircraft registry.
Deregistration Power of Attorney (PoA): These are recognised and enforceable but a PoA cannot be irrevocable. However, an Irrevocable Deregistration and Export Request Authorisation (IDERA) cannot be revoked and will be recognised and enforced by the Civil Aircraft Registry.
Cape Town: Turkey has ratified Cape Town.

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Ukraine

Registry: Civil Aircraft Register of Ukraine **Prefix:** UR-

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: A list of aircraft type certificates may be checked at SAA site https://avia.gov.ua/npd/tyav-opovitryanyh-suden-shvaleni-diya-ekspluatatsiiyi-v-ukraini/
Typical Structure: There is no requirement for the typical structure. An aircraft leased by a Ukrainian carrier may be registered in the Registry. The owner of the aircraft or its lessor has no requirement to establish a local company. Aircraft registration under the lease contract does not create a taxable presence in Ukraine, neither for the owner nor for the lessor.
Refer to the website for the documents that must be submitted by the applicant that is usually a local lessee, to effect the registration of an aircraft in the Aircraft Registry.

Operation

Private Use: Yes
Commercial Air Transport: Yes

Finance

Mortgage Possible? Although the mortgage is used quite widely in Ukraine as a form of security, Ukrainian law does not stipulate any particular type of mortgage for aircraft. The Ukrainian law provides on possessory and non-possessory mortgages, while non-possessory aircraft mortgages are used in modern practice. The aircraft mortgage will automatically cover all accessories and spare parts unless it is expressly stipulated otherwise in the mortgage.
Restriction Governing Mortgage Law: The Ukrainian law on International Private Law, No.2709-IV dated June 22, 2005 (as amended) allows the parties to agree on any applicable law, including a foreign one, unless the aircraft is registered in Ukraine. The Ukrainian law shall govern the mortgage over registered in Ukraine aircraft. The mortgage over Ukrainian registered aircraft is valid if it is made in written and executed before a Ukrainian notary.
Priority Notice: The Law on Mortgage does not stipulate any cure period or obligation to submit a notification of the mortgagee's default or register its notice of default in the Mortgage Registry. Nor does it lay down any requirements concerning the minimum content of the notice of default. Please refer to the website for more information.
Public Registration: A lien over an aircraft irrespective of whether the aircraft mortgage agreement is executed before the Ukrainian notary or abroad may be registered with the Mortgage Registry.
Deregistration Power of Attorney: The Ukrainian Aircraft Registry is held in the name of the owner. Correspondingly only the owner or its duly empowered representative may deregister the aircraft. Additionally, the lessor usually receives from a lessee an irrevocable deregistration power of attorney.
Cape Town: On November 1st 2012, the Convention on International Interests in Mobile Equipment (the Cape Town Convention) became effective for Ukraine. SAA was designated as an entry point for information related to registration of any security-type interests (created by or subject to security agreements, lease agreements, and title reservation agreements) relating to aircraft (the "International Interests") or irrevocable deregistration authorisations (IDERAs) with the International Registry. Please see website for more details.

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United States

Registry: Federal Aviation Administration Civil Aircraft Registry **Prefix:** N-
Location: North America **Country Status:** Constitutional Federal Republic

Aircraft

Weight Restrictions: None
Maximum Age: None
Aircraft Type Certificate: FAA
Typical Structure: Owner registry. Owner must be a US Citizen as defined in 49 USC 40102 (a) (15).

Operation

Private Use: Yes
Commercial Air Transport: Yes.

Finance

Mortgage Possible? Yes
Restriction Governing Mortgage Law: No, individual state laws govern.
Priority Notice: No, except for prospective interest registrations under the Cape Town Treaty.
Public Registration: Yes, Federal Aviation Administration
Deregistration Power of Attorney: Yes, if the Cape Town Treaty is applicable
Cape Town: Yes, with the Federal Aviation Administration as entry point to obtain a unique authorization code to allow registrations on the International Registry.

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