

Part 21 DOA Implementation & Product Certification Workshop (Industry)

Group 5 Concessions

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Regulatory context

AMC No. 1 to 21.A.243(a) Data requirements

The handbook should provide the following information for each product covered by the design organisation approval :.../..

4.c The procedures for classifying and approving unintentional **deviations from the approved design data** occurring in production (concessions or non-conformance's).

GM No. 2 to 21.A.165(c) Obligations of holder – Conformity with type design :

.../...There are also likely to be unintentional divergences (concessions or non-conformances) during the manufacturing process. All these **changes** are required to have been approved by the design approval applicant/holder.

EASA Form 52 (Product level):

Block 12 Approved unintentional deviation to the approved type design sometimes referred to as concessions, divergences, or non-conformances.
Block 13 Only agreed exemptions, waivers or derogations may be included here.

Proposed Clarification

- Different interpretations within Industry and EASA.
- Clarification should cover the:
 1. Definition of unintentional deviations from the approved design data occurring in production (*Concession or non-conformance's*)
 2. Classification rules/criteria
 3. Concession approval and required privileges (if any)
 4. Compliance demonstration
 5. Impact on limitations
 6. Independent checking function involvement
 7. Record keeping requirements for DOAs
 8. Identification within the product/part/appliance production organisation release documentation (EASA Form 52, EASA Form 1)

Proposed way forward

3 options – to consider “concessions” in Part 21 either as

1. Change to type design with same rules (subpart D),
2. Repair with same rules (Subpart M),
3. **Specific deviation to type design**

Option 1 and 2 implies change in Part 21

Option 3 implies to

- a. further develop existing guidance material AMC No. 1 to 21.A.243(a) Data requirements and/or**
- b. recognize industry standard from DOA TT WG09**

Option 3b is the preferred one by the group 5 😊

Harmonized industry process for “Concession management” is the objective of DOA TT WG09

End slide

Regulatory context

SUBPART F — PRODUCTION WITHOUT PRODUCTION ORGANISATION APPROVAL

GM 21.A.126(b)(5) Production Inspection System – Engineering and manufacturing review procedure

1. The procedure should permit to record the deviation, to present it to the Design holder under the provisions of 21.A.122, and to record the results of the review and actions taken consequently as regards the part/product.
2. *Any unintentional deviation from the manufacturing/inspection data should be recorded and handled in accordance with Part 21 Section A Subpart D or E as changes to the approved design.*