

Guide for Compliance with PART 21 as amended by EU Regulations 2022/201 and 2022/203 in Production area

Foreword

[Regulation \(EU\) 2022/201](#) and [Regulation \(EU\) 2022/203](#) amending Regulation (EU) No. 748/2012 introduce new requirements as of 07 March 2023 for organisations certified pursuant Part 21, Subpart G (hereinafter referred to as POA). This guide offers the view of EASA on the transition of existing POAs and competent authorities to the new requirements, based on the Article 9 of Regulation (EU) No. 748/2012 as amended by Regulations (EU) 2022/201 and (EU) 2022/203. This is not binding material.

EASA reminds users that this transition process will be under the oversight of the competent authority and that any particular case or situation should be discussed and agreed with the competent authority.

List of revisions

| | |
|---------------|-----------------|
| February 2023 | Initial version |
| | |

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I. Introduction

a. General

Regulations (EU) No. 2022/201 and (EU) No. 2022/203 amending Regulation (EU) No. 748/2012 become applicable on 7 March 2023. The content of the regulation (EU) No. 748/2012 is impacted as shown below (Subparts identified in grey shading do not generate POA related changes):

| Reference | Designation | Topic | Changes |
|-----------|---|---|---|
| | Cover Regulation | Articles 1 to 12 of the Regulation | Article 8 para. 4 and Article 9 para. 5 - establishing a transition period until 7 March 2025. |
| 21.1 | Competent Authority | Competent authority definition | Change of title to harmonise it with the contents; Competent authority for each subpart of Section A and B and their responsibilities in implementing Part 21 have been defined in this point; Introduction of definitions and abbreviations. |
| 21.2 | Scope | Scope of the regulation | New point that defines the scope of Section A and B. |
| Subpart A | General Provisions | Rights and obligations under Section A and Section B | Minor improvements of text; Introduction of voluntary reporting; Requirements for production organisations reporting transferred from points 21.A.129 and 21.A.165; Replacing all record-keeping and investigation requirements for Section A; Alignment of Section B with the continuing airworthiness regulations. Refer to appendices to this guide for detailed explanations: Appendix I – Novelties in Section A Subpart A related to POA Appendix III – Competent authorities. |
| Subpart B | Type-Certificates and Restricted Type-Certificates | Issuing TC and RTC, and holder rights and obligations | References updated for obligations of holder; Applicability to ETSO authorisation for APU added; Records-keeping requirements moved to point 21.A.5. |
| Subpart D | Changes to Type-Certificates and Restricted Type-Certificates | TC and RTC changes, and holder rights and obligations | Applicability to ETSO authorisation for APU added; Records-keeping requirements moved to point 21.A.5. |

| Reference | Designation | Topic | Changes |
|-----------|--|---|---|
| Subpart E | Supplemental type-certificates | Major changes to TC under STC procedures | References updated for obligations and EPA marking. |
| Subpart F | Production without Production Organisation Approval (LoA) | Conformity of items manufactured without a POA under Subpart F, and manufacturer rights and obligations | <p>Commission Implementing Regulation (EU) 2022/1253 Art. 1 point 6 introduces a correction to Delegated Regulation 2022/201, related to Section A, Subpart F, i.e. the two-year transition period between the 7th of March 2023 and the 7th of March 2025 is not relevant to this Subpart as LoA approvals are limited to a shorter period than the transition period.</p> <p>Therefore, organisations for which the LoA is issued on or before 7 March 2023, are not required to comply with the new requirements. Organisations for which the LoA is issued after 7 March 2023, are required to comply directly with the new requirements.</p> <p>Note: Section A, Subpart F changes are related to occurrence reporting and records keeping which were moved to Subpart A.</p> <p>Alignment of Section B with the continuing airworthiness regulations.</p> <p>Refer to appendices to this guide for detailed explanations: Appendix III – Competent authorities.</p> |
| Subpart G | Production Organisation Approval | Conformity of items manufactured with a POA, and POA holder rights and obligations | <p>Introduction of the AltMoC process; Introduction of the safety management according to the 12 elements defined in ICAO Annex 19; Minor improvement of text and reference updated. Alignment of Section B with the continuing airworthiness regulations.</p> <p>Refer to appendices to this guide for detailed explanations: Appendix II – Production organisations Appendix III – Competent authorities.</p> |
| Subpart H | Certificates of Airworthiness and Restricted Certificates of Airworthiness | Issue of CofA and RCofA | <p>References updated, text improved and harmonised with similar requirements in other subparts; Inspection requirements moved to point 21.A.9.</p> <p>21.B.330 and 21.B.345 moved to 21.B.65 and 21.B.55.</p> |



| Reference | Designation | Topic | Changes |
|-----------|---|--|--|
| Subpart I | Noise Certificates | Issue of Noise Certificates | References updated, text improved and harmonised with similar requirements in other subparts; Inspection requirements moved to point 21.A.9. 21.B430 and 21.B.445 moved to 21.B.65 and 21.B.55. |
| Subpart J | Design Organisation Approval | DOA, and holder rights and obligations | References updated, text improved; Introduction of ICAO Annex 19 SMS elements; Introduction of requirements for new management functions. New Section B requirements for the Agency. |
| Subpart K | Parts and Appliances | Approval of parts and appliances | None |
| Subpart M | Repairs | Approval of a repair design, and holder rights and obligations | References updated for obligations and EPA marking. Records-keeping requirements moved to point 21.A.5 |
| Subpart O | European Technical Standard Order Authorisations | ETSO Authorisation, and holder rights and obligations | References updated and text improved in obligations, duration and validity, and APU ETSO Authorisation. Records-keeping requirements moved to point 21.A.5; Inspection requirements moved to point 21.A.9 |
| Subpart P | Permit to Fly | Issue of Permit to Fly | References updated and text improved in duration and validity; Records-keeping requirements moved to point 21.A.5; Inspection requirements moved to point 21.A.9. 21.B.530 and 21.B.545 moved to 21.B.65 and 21.B.55. |
| Subpart Q | Identification of Products, Parts, and Appliances | Requirements for the identification of Products, Parts, and Appliances | None |

b. Transition

From 7 March 2023 each production organisation that holds a valid approval certificate (POA) issued in accordance with Annex I (Part 21, subpart G) should comply with the Annex I Section A requirements introduced by Commission Delegated Regulation (EU) 2022/201. There is a transition period allowing the POA to correct any findings of non-compliances with the new Part 21 requirements ('transition findings') until 07 March 2025 (Commission Implementing regulation (EU) 2022/1253).

The main change introduced in the regulation is the required implementation of a Safety Management System for production organisations holding an approval certificate (POA). SMS requires, amongst others, to implement a safety risk management (including hazard identification, associated risks and mitigation measures)



and safety assurance processes and the designation of a safety manager. To support the safety management system processes, several organisation requirements have been changed or introduced including the safety policy, internal occurrence reporting, competence of staff, and production management system. The production management system includes a safety management element and a quality management element.

To verify that the POAs have a management system, the regulation also introduces additional requirements for the competent authority (CA) – such as to define and implement its own management system. This should enable the CA to verify and continuously monitor the effectiveness of the organisation’s management system and associated safety performance management.

It is considered that SMS is a concept that may need to mature over multiple years. Therefore, it is not anticipated that POAs will have a fully operational and effective SMS in the first oversight cycle or at the end of the transition period. However, the minimum level to retain the Part 21, Subpart G certificate is that the organisation can show that the system and procedures are ‘present’ and ‘suitable’.

Section II of this Guide illustrates a typical process that may be followed by a POA and its competent authority for the transition from the previous regulation to the new regulation.

Section III of this Guide, Guidance for Organisations, provides a step approach for the typical transition process.

Section IV of this Guide, Guidance for authorities provides guidance for competent authorities for the transition process.

Appendix I and II details the changes in Part 21 Section A, which applies to the technical requirements to be met by an organisation.

Appendix III details the changes in Part 21 Section B, which applies to competent authorities.

Convention

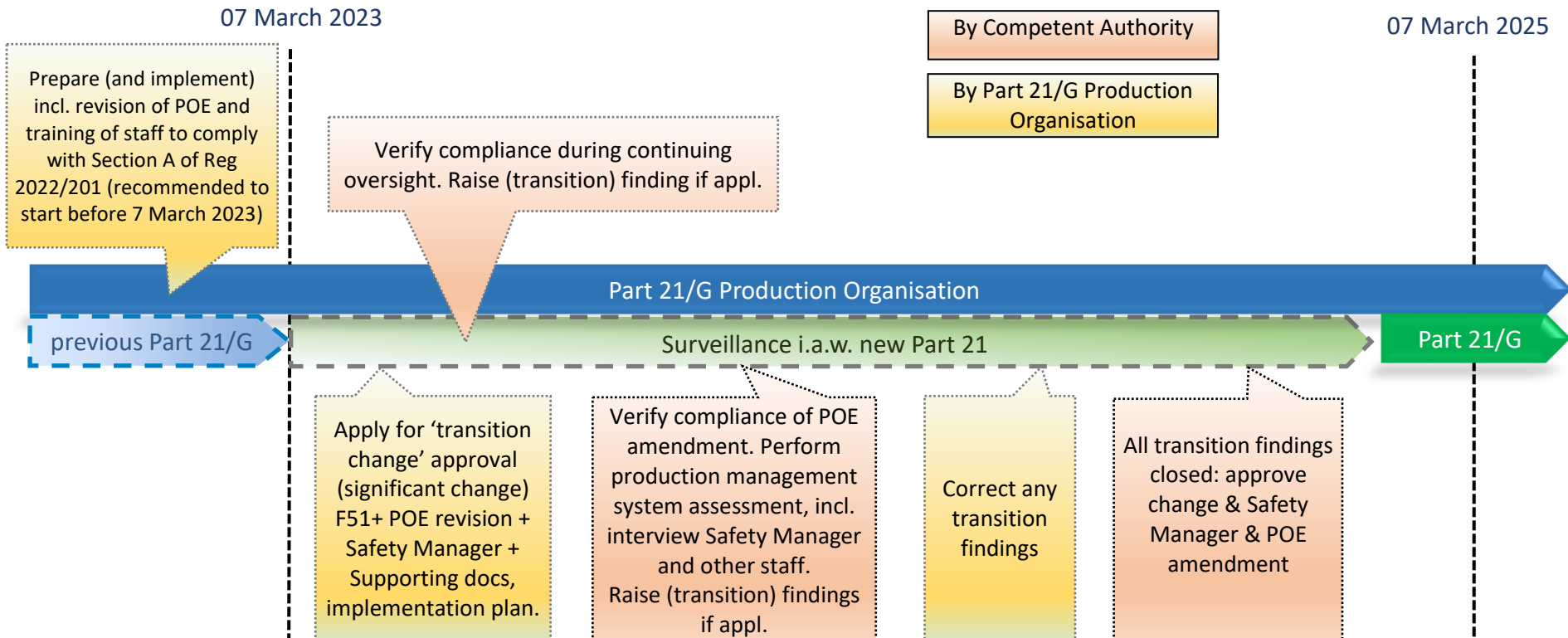
In the rest of this document:

- ‘new Part 21’ is the Annex I (Part 21) of Regulation (EU) No. 748/2012 as amended by Commission Delegated Regulation (EU) 2022/201 and Commission Implementing Regulation (EU) 2022/203.
- ‘old Part 21’ is the Annex I (Part 21) of Regulation (EU) No. 748/2012 as amended before Commission Delegated Regulation (EU) 2022/201 and Commission Implementing Regulation (EU) 2022/203.
- ‘Transition findings’ are findings of non-compliance related to the Annex I (Part 21) requirements introduced by Regulation (EU) 2022/201 as novel compared to ‘old Part 21’. Refer to Appendix I and II. Closure date for these transition findings shall not exceed 7 March 2025. This may include a single ‘generic’ transition finding.
- ‘Generic transition finding’ is a finding raised to indicate that the POA has not introduced a management system pursuant the ‘new Part 21’ requirements.
- ‘Oversight finding’ in this document is a finding raised against the requirements in old Part 21, before the transition change is approved.



II. Overview of the transition to new Part 21 (considering the applicability dates for Part 21/G Production Organisations)

The following figure provides an overview for an acceptable transition process.



Notes

- transition finding could be generic or individual (refer to section **Error! Reference source not found.** points 3 and 4).
- despite the flow presenting more than 24 months transition process, EASA expectation is that the full process should typically last a few months and be completed well before the deadline.

III. Guidance for organisations

a. Organisations not holding a Part 21, Subpart G Certificate (initial certification)

If your organisation already applied for Part 21, Subpart G approval before 7 March 2023 and the application has not been fully processed (on-going), your organisation will have to adapt and show full compliance with 'new Part 21' to be eligible for an initial approval. No transition period applies in this case.

Any application for initial approval received after 7 March 2023 will be processed in accordance with the new Part 21.

b. Organisations holding a valid Part 21, Subpart G Certificate on 7 March 2023 – transition change

The POA should develop a plan and implement the necessary changes. The POA should apply to the competent authority pursuant article 21.A.147 for approval of:

- The person responsible for the safety management element (processes) (21.A.139(c)2.)
- The revised POE pursuant point 21.A.143 including, as a minimum,
 - the name of the person responsible for the safety management element (21.A.143(a)2.);
 - description of the production management system, the policy, and applicable processes and procedures (21.A.143(a)11.)

Organisation should consider applying for the 'transition changes' on time to ensure that the CA has sufficient time to perform the investigation, raising and evaluating the closure of all findings and approving the 'transition change(s)' not later than 7 March 2025. The competent authority may establish a time frame in which all organisations should submit the applications which would allow the competent authority sufficient time to review all applications before the date of 7 March 2025.

If late or not submitted applications, the Part 21, subpart G approval certificate will be revoked, suspended, or limited on 7 March 2025.

c. Organisations holding a valid Part 21, Subpart G Certificate on 7 March 2023 – other changes during transition period

The POA may apply for other changes (i.e., adding a rating or facility) during the transition period. The competent authority should establish the conditions under which the organisation may operate during the change.

d. Organisations holding a valid Part 21, subpart G Certificate on 7 March 2023 – regular oversight during transition period

During the transition period, the competent authority should perform continuing oversight. When findings of non-compliances with Part 21 are found, the competent authority should grant the corrective action implementation period related to the type of finding. 'Transition findings', detailed below in the Appendices

I and II, may have an implementation period longer than the regular period of 3 months but should ultimately be closed (including acceptance of the competent authority) by 7 March 2025. Regular oversight findings should be handled pursuant point 21.B.225.

e. Organisations holding a suspended Part 21, Subpart G Certificate on 7 March 2023 (iaw old Part 21)

When the certificate is suspended pursuant old Part 21 (point 21.B.245), it shall only be reinstated after compliance with Section A Subpart G has been re-established, meaning compliance with new Part 21 requirements. As the POA cannot exercise its privileges at the date of applicability of Regulation (EU) 2022/201, the transitional requirement of article 9 paragraph 5 does not apply.

IV. Proposed actions for Competent Authorities (CA)

a. Between entry into force and applicability date

- Review and implement amendment of CA procedures i.a.w. Regulation (EU) 2022/203 including but not limited to:
 - Training, qualification standards and associated authorisation for authority staff ensuring that training on the new Part 21 requirements has been received
 - Procedure for organisation's management system assessments
 - Procedure for processing alternative means of compliance
 - Procedure for safety risk management process
 - Procedure for initial certification, changes and continuing oversight
 - Procedure for developing oversight program based on size and complexity and performance of organisation and on the assessment of associated risks
 - Procedure for approval/acceptance of Safety Manager
- Initial / continuation training of CA staff, in particular on SMS for Part 21 and assessment of Part 21, Subpart G Organisations' production management system. For the assessment of the management systems, the [EASA Management System Assessment Tool \(MSAT\)](#) may be useful.

b. Develop CA implementation plan and monitor progress implementation

- Provide information and guidance to impacted organisations and persons on main differences and novelties:
 - Structure of regulation
 - Options for combinations of approvals and privileges



- Training of organisation's staff (e.g. SMS for POA)
- Application process considering new Section B of Part 21
- Deadlines and consequences (e.g. revocation)
- Update (IT) control systems and Forms
- Assess impact on resources and take necessary actions

c. Regular oversight after 7 March 2023

- The new Part 21 requirements are applicable from 7 March 2023 and when non-compliances are found, the competent authority should raise a finding either a regular oversight finding or a transition finding.
- At the earliest opportunity after 7 March 2023, if no application for a transition change is received, upon evidence of non-compliance with the new Part 21, the CA may raise a “generic transition finding”. This could be particularly useful when the organisation is not properly planning or implementing the transition and the number of single transition findings will be too large.
- As of 7 March 2023 an application for a transition change that has already been received will not mandatorily imply the issuance of a generic transition finding, as the investigation process is on-going.
- The proposed wording of the level 2 ‘generic transition finding’ is ‘the Production Organisation has not demonstrated compliance with the Part 21 requirements as introduced by Regulation (EU) 2022/201. According to article 9 paragraph 5 of Regulation (EU) 748/2012 the organisation shall take necessary measures to demonstrate to the satisfaction of the competent authority that, before 7 March 2025, it complies with the applicable requirements newly introduced by Part 21. To this end, the organisation should establish and communicate to the competent authority an implementation plan. In the meantime, the organisation shall continue working with the existing procedures as per the agreed exposition’.
- By raising generic or individual transition findings at the earliest opportunity, the competent authority would have better control over the progress within each organisation.
- If the oversight cycle is ending before the transition is completed, the recommendation report (new EASA Form 56) should be used and include the open transition findings with latest due date 7 March 2025. Other findings will be processed as per normal closure period.

d. Verification of compliance for each ‘transition change’ application

- After receipt of the application, the competent authority should establish the conditions under which the organisation may continue to operate, i.e. either based on the old Part 21, or based on new Part 21 with limited open transition findings. This latter requires that the organisation has already implemented SMS (in approved POE) with its staff trained accordingly.
- The competent authority should plan and perform an interview with the Safety Manager.



- The competent authority should assess the POE amendment and supporting documents.
- If found acceptable, the competent authority should perform an audit to assess the organisation's management system and processes to make sure that all the required enablers of a functioning management system are present and suitable. For this purpose, the competent authority may use the [EASA Management System Assessment Tool](#).
- When findings of non-compliance with the 'new Part 21' are found, a transition finding should be raised which need to be closed ultimately on 7 March 2025. The CA may decide to initially grant a corrective action implementation period appropriate to the nature of the finding, i.e. earlier than 7 March 2025.
- When satisfied that the organisation complies with the applicable requirements, the CA shall formally approve the POE. The new EASA Form 56 should be used to document the assessment.

Notes

- 'Reissuance of the Part 21, Subpart G certificate "EASA Form 55" is not required.
- To monitor the status of POAs having completed or not (yet) completed the 'transition change', it is recommended that the competent authority maintains a list of organisations indicating the status.
- After the 'transition change' is approved, any non-compliance to new Part 21 is an oversight finding, even if the transition period (ending on 7 March 2025) is still running.



Appendix I — Novelties in Section A Subpart A related to POA

Potential transition findings are identified in yellow shading (due date 7 March 2025) / Editorial changes not requiring dedicated transition finding are identified in blue shading (due date 7 March 2023) / Points identified in grey shading do not generate changes.

| Subpart A requirement | Changes in 'new Subpart A' | Impact analysis |
|--|--|---|
| 21.A.1 - Scope | Minor improvement of text | No impact |
| 21.A.2 - Undertaking by another person than the applicant for, or holder of, a certificate | No change | No impact |
| 21.A.3A - Reporting system | (b) New: establishing occurrence reporting as part of the management system and in compliance with regulations (EU) No 376/2014 and (EU) 2018/1139. Previously only partially covered | Potential transition finding of non-compliance with 21.A.3A(b)1/(c). This can be alternatively covered by a transition finding against 21.A.139 |
| | <p>New: introduction of errors, near misses, and hazards that do not fall under the category of failures, malfunctions, defects, or other occurrences which cause or might cause adverse effects on the continuing airworthiness</p> <p>New: Introduction of voluntary reporting of potential hazards to organisations</p> <p>Requirements for POA transferred from 21.A.165</p> | In case of non-compliance with any other element previously covered by former 21.A.3A and 21.A.165, an oversight finding should be raised |
| 21.A.3B – Airworthiness directives | No change | No impact |

Potential transition findings are identified in yellow shading (due date 7 March 2025) / Editorial changes not requiring dedicated transition finding are identified in blue shading (due date 7 March 2023) / Points identified in grey shading do not generate changes.

| Subpart A requirement | Changes in 'new Subpart A' | Impact analysis |
|---|--|---|
| 21.A.4 - Coordination between design and production | No change | No impact |
| 21.A.5 – Record-keeping | New: Record-keeping requirements for personnel | Potential transition finding of non-compliance with 21.A.5(d)/(e)1/(e)2 |
| | Requirements for Subpart 21G transferred to 21.A.5 from 21.A.145(d)(2) | In case of non-compliance with any other element previously covered of 21.A.5 other than (d), an oversight finding should be raised |
| 21.A.6 – Manuals | No change | No impact |
| 21.A.7 – Instructions for continued airworthiness | No change | No impact |
| 21.A.9 – Access and investigation | ALL requirements of Section A transferred to Subpart A Requirements for Subpart 21G transferred to 21.A.9 from 21.A.157 | No transition finding foreseen Requirements detailed and clearly identified |

Appendix II — Novelties in Section A Subpart G

Potential transition findings are identified in yellow shading (due date 7 March 2025) / Editorial changes not requiring dedicated transition finding are identified in blue shading (due date 7 March 2023) / Points identified in grey shading do not generate changes.

| Part 21G requirement | Changes in 'new Part 21G' | Impact analysis |
|---|--|---|
| 21.A.131 - Scope | No change | No impact |
| 21.A.133 – Eligibility | No change | No impact |
| 21.A.134 – Application | No change | No impact |
| 21.A.134A – Alternative means of compliance | New: introduction of the AltMoC process | Potential transition finding of non-compliance with 21.A.143(a)(11) Alternative means of compliance may be used to comply with the applicable requirements of the regulation. Such alternative means must be submitted to the CAA for approval before applying them |
| 21.A.135 - Issuance of production organisation approval | Editorial change in section title: 'issue' becomes 'issuance' | No impact |
| 21.A.139 - Production management system | New: Introduction of the safety management element according to the 12 elements defined in ICAO Annex 19 | Potential transition finding of non-compliance with 21.A.139(a)/(b)/(c)/(e)/(f) New: para. (a) introduces the requirement for a production management system, combining a safety management element and a quality management element; it also introduces requirements for clearly defined lines of responsibility New: para. (b) introduces the requirements for an appropriate and proportionate production management system New: para. (c) introduces the main novelty of the regulation, the principles of SMS and their associated requirements: <ul style="list-style-type: none"> - Safety policy and objectives - Key safety personnel - Safety risk management process |

Potential transition findings are identified in yellow shading (due date 7 March 2025) / Editorial changes not requiring dedicated transition finding are identified in blue shading (due date 7 March 2023) / Points identified in grey shading do not generate changes.

| Part 21G requirement | Changes in 'new Part 21G' | Impact analysis |
|--|---|--|
| | | <ul style="list-style-type: none"> - Safety assurance process - Safety promotion - Compliance of occurrence reporting with Reg (EU) No. 376/2014 and Reg. (EU) No. 2018/1139 <p>As part of the transition of an organisation, the competent authority should assess the organisation's production management system and processes to make sure that all the required enablers of a functioning management system are present and suitable</p> <p style="background-color: #e6f2ff;">In case of non-compliance with 21.A.139(d), an oversight finding should be raised</p> |
| 21.A.143 - Production organisation exposition | Minor improvement of text and reference updated | <p style="background-color: #fff9c4;">Potential transition finding of non-compliance with 21.A.143(a)(11)/(b)</p> <p style="background-color: #e6f2ff;">In case of non-compliance with any other element of 21.A.143(a) other than (a)(11), and with 21A.143(c), an oversight finding should be raised</p> |
| 21.A.145 – Resources | Minor improvement of text and reference updated | <p style="background-color: #fff9c4;">Potential transition finding of non-compliance with 21.A.145(c)(2)</p> <p style="background-color: #e6f2ff;">In case of non-compliance with any other element of 21.A.145(c) other than (c)(2), and with 21.A.145(a)/(b)/(d) an oversight finding should be raised</p> |
| 21.A.147 - Changes in the production management system | Minor improvement of text and reference updated | No impact |
| 21.A.148 - Changes of location | No change | No impact |
| 21.A.149 - Transferability | No change | No impact |
| 21.A.151 - Terms of approval | No change | No impact |

Potential transition findings are identified in yellow shading (due date 7 March 2025) / Editorial changes not requiring dedicated transition finding are identified in blue shading (due date 7 March 2023) / Points identified in grey shading do not generate changes.

| Part 21G requirement | Changes in 'new Part 21G' | Impact analysis |
|---|--|---|
| 21.A.153 - Changes to the terms of approval | No change | No impact |
| 21.A.158 - Findings and observations | Finding classification, and requirements for competent authorities moved to Section B Para. (c) introduces the requirement for due consideration of observations Note: Level III findings are replaced by observations | Low impact because the concept is the same as 'Level 3' findings. |
| 21.A.159 - Duration and continued validity | References updated, text improved and harmonised with similar requirements in other subparts | No impact |
| 21.A.163 – Privileges | No change | No impact |
| 21.A.165 – Obligations of the holder | Reporting requirements moved to point 21.A.3A | No impact |

Appendix III — Novelties in Part 21 Section B – Procedures for Competent Authorities

| Part 21 requirement | Equivalent in 'old Part 21' | Impact on the administrative procedures established by the competent authority |
|---|-----------------------------|--|
| SUBPART A — GENERAL PROVISIONS | | |
| - | 21.B.5 | Deleted. No impact – content moved to 21.2 |
| 21.B.10 Oversight documentation | - | New point aligned with Part-CAMO Section B. |
| 21.B.15 Information to the Agency | - | New point aligned with Part-CAMO Section B. |
| 21.B.20 Immediate reaction to a safety problem | | New point aligned with Part-CAMO Section B. |
| 21.B.25 Management system | 21.B.25 & 21. B.30 | <p>New point aligned with Part-CAMO Section B.</p> <p>(a) new requirements for</p> <ul style="list-style-type: none"> • a system to plan availability of personnel (2) • facilities (4) • compliance monitoring system including safety risk management process (5) • person responsible for the compliance monitoring function (6) <p>(b) new appointment of persons for each field of activity</p> <p>(c) updated mutual exchange of information (before elements were in 21.B.25 (b)2) and 21.B.45)</p> <p>(d) new availability of management system procedures for EASA</p> <p>This would require the NCA to implement a management system which includes safety risk management processes.</p> <p>It should be noted that the related AMC/GM's will be more elaborated than the previous GM's to 145.B.10 and would require amongst others additional training and comprehensive knowledge of</p> |

| Part 21 requirement | Equivalent in 'old Part 21' | Impact on the administrative procedures established by the competent authority |
|--|--|---|
| | | NCA inspectors on SMS and Management system assessments, human factors and human performance principles etc. |
| 21.B.30 Allocation of tasks to qualified entities | - | New point aligned with Part-CAMO Section B. New requirement for use of qualified entities although this was already allowed under article 69 of Regulation (EU) 2018/1139. |
| - | 21.B.40 | Deleted – Agency has no mandate to mediate disputes between the competent authorities |
| 21.B.35 Changes in the management system | 21.B.35 | New point aligned with Part-CAMO Section B. Aligned requirements to keep management system up to date and to notify EASA of changes that affect the capability to perform its certification and oversight tasks. |
| 21.B.55 Record-keeping | 21.B.55 & 21.B.125 & 21.B.260 & 21.B.345 & 21.B.445 & 21.B.545 | Text aligned with Part-CAMO Section B. Elements already existed. New under (a) (1) management system documents (2) training, qualification and authorisation of its personnel (3) allocation of tasks New under (b): (1) alternative means of compliance (2) safety information (3) safeguard and flexibility provisions (c) new list of certificates / approvals / letters of agreement (d) retention period was 6 years, now 5 years (d) new availability of records to other authorities and EASA (before elements were in GM 21.B.20) |
| 21.B.65 Suspension, limitation and revocation | 21.B.145 & 21.B.245 & 21.B.330 & 21.B.430 & 21.B.530 | New point aligned with Part-CAMO Section B. Elements already existed. (c) new requirement that the NCA shall suspend or limit in whole or in part a certificate if unforeseeable circumstances outside the control of the competent authority prevent its inspectors from discharging their oversight responsibilities over the oversight planning cycle. |

| Part 21 requirement | Equivalent in 'old Part 21' | Impact on the administrative procedures established by the competent authority |
|--|------------------------------|---|
| SUBPART F — PRODUCTION WITHOUT PRODUCTION ORGANISATION APPROVAL | | |
| 21.B.115 Alternative means of compliance | | New provision that the authority may use alternative means of compliance for itself and, if approved, by the organisations provided that the Agency is informed. |
| 21.B.120 Initial certification procedure | 21.B.120 partial & 21. B.130 | New point aligned with Part-CAMO Section B. |
| 21.B.125 Findings and corrective actions; observations | 21.B.125 | Updated to include classification and requirements for competent authorities previously contained in Section A and align with CAW regulations. (a) new requirement to have a system to analyse findings for their safety significance. (d) new requirement for the NCA to assess and accept the corrective action plan (d) new requirement to inform the NCA where the aircraft is registered in case of a Level 1 related to aircraft (f) Level 3 findings converted to Observations. |
| 21.B.135 Maintenance of the letter of agreement | 21.B.135 | No change |
| 21.B.140 Amendment of a letter of agreement | 21.B.140 | No change |
| SUBPART G — PRODUCTION ORGANISATION APPROVAL | | |
| 21.B.215 Alternative means of compliance | - | New requirement / point aligned with Part-CAMO Section B. New provision that the authority may use alternative means of compliance for itself and, if approved, by the organisations provided that the Agency is informed. |

| Part 21 requirement | Equivalent in 'old Part 21' | Impact on the administrative procedures established by the competent authority |
|---|-------------------------------------|--|
| 21.B.220 Initial certification procedure | 21.B.220 partial & 21.B.230 | <p>(a) where previously covered under 21.B.220(c)1.</p> <p>(b) new requirement for meeting with the accountable manager, before was included in GM No 2 to 21.B.220(c) 6.</p> <p>(c) new requirement for audits records, before detailed in GM No 2 to 21.B.220(c) 5;</p> <p>(d) new requirement of correcting all findings before the certificate can be issued</p> <p>(e) new point coming from 21.B.230(a)</p> <p>(f) new requirement about unlimited duration of the certificate (before included in the Form 55)</p> <p>(g) new point coming from 21.B.230(b)</p> |
| 21.B.221 Oversight principles | 21.B.235 partial & 21.B.220 partial | <p>New point aligned with Part-CAMO Section B.</p> <p>(a) to (c) more prescriptive than previously</p> <p>(d) and (e) new requirements as previously there were under GM.B.202(a) and GM.235(b) - (d) is less restrictive ('may' while previously 'will'). (e) requires the authority to inform other authority in case oversight performed in another member state.</p> <p>(f) new</p> |
| 21.B.222 programme | Oversight 21.B.235 | <p>New point aligned with Part-CAMO Section B.</p> <p>More prescriptive requirements as some of them were previously in the GMs, such as: meeting with Accountable manager (b)(2), records of the dates when assessments, audits, inspections and meetings are due, and when assessments, audits, inspections and meetings have been effectively carried out (f).</p> <p>However, the requirement of performing a minimum one surveillance audit per year was removed.</p> <p>New in (b) management system assessments to be considered.</p> <p>Clearer concept of product audits and process audits.</p> <p>Unplanned POA reviews replaced by unannounced inspections.</p> <p>(d) new possibility to extend oversight cycle to 36 months and 48 months</p> <p>(e) new reduction of oversight planning cycle</p> <p>(g) new although was previously under AMC 21.B.235(c)</p> |

| Part 21 requirement | Equivalent in 'old Part 21' | Impact on the administrative procedures established by the competent authority |
|---|-----------------------------|---|
| 21.B.225 Findings and corrective actions; observations | 21.B.225 | Updated to include classification and requirements for competent authorities previously contained in Section A and align with CAW regulations. (a) new requirement to have a system to analyse findings for their safety significance. (d) new requirement for the NCA to assess and accept the corrective action plan. (d) new requirement to inform the NCA where the aircraft is registered in case of a Level 1 related to aircraft. (f) Level 3 findings converted to Observations. The new concept impacts the procedures. |
| 21.B.240 Changes in production management system | 21.B.240 | (b) new although was previously under 21.A.147(b). (d) new requirement for NCA to consider the need to suspend/limit the certificate in case that organisation implemented a significant change require prior approval without having received the approval. (e) "non-significant changes" replaced "minor changes" concept. |