

EASA  
Part 21 Design Organisation Approval  
(DOA)  
Implementation  
&  
Product Certification Workshop  
- Industry Session -

**18-19 November 2015**  
**“RHEINSAAL” HYATT Conference Room**  
**Hyatt Regency Hotel**  
**Cologne, Germany**

Part 21 DOA Implementation & Product Certification Workshop (Industry)

# Group 5 Parts Marking

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“RHEINSAAL” HYATT Conference Room  
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## Regulatory context – 21.A.804 Identification of parts and appliances

### 21.A.804:

- (a) **Each** part or appliance shall be marked permanently and legibly with:
1. a name, trademark, or symbol **identifying the manufacturer in a manner identified by the applicable design data; and**
  2. ../...

### GM 21.A.804(a)(1) :

It is not the intent of 21.A.804(a)(1) to introduce an obligation for a production organisation (manufacturer) to mark new parts or appliances with information which is not identified by the design approval holder. Therefore, **the physical marking of parts and appliances is only required when established by the design approval ... holder.**

# Proposed Clarification

- **What is included within “Part and appliance” ?**
  - Limited to SRU/LRU ?
- **What is meant by the manufacturer? Is it:**
  - a. POA holder who has manufactured the part?
  - b. Or in a case when the POA holder has sub-contracted manufacture of the part, non POA holder subcontract company who has manufactured the part?
- **What is the reason for requiring the manufacturer to be identified on the part?** Is it to ensure traceability of parts in case anything safety related happens, or could happen, to the Product in-service and investigation of the parts is required including the ability to identify their manufacturers?
  - The requirements for identification of the manufacturer on the part should be related to the Safety Significance level of the part. Identification of manufacturer should not be a regulatory requirement for non safety related/non serialised parts.
  - Industry should not have to shoulder the cost of marking the manufacturer on parts that are non safety related

## Proposed way forward

➤ Update 21.A.804 to read:

### **21.A.804 Identification of parts and appliances**

(a) Each part or appliance shall be marked permanently and legibly with:

1. a name, trademark, or symbol identifying the manufacturer ~~in a manner identified~~ **when required** by the applicable design data; and
2. .../...

➤ To further clarify in GM 21.A.804, the definition of :

➤ Manufacturer

➤ Parts and Appliance (wrt 21.A.804(a)1.)

**End slide**