



SIDE MEETING GROUP 3 - Suppliers control

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Part 21 Workshop
November 26th 2024

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Part-21 Implementation Workshop

Side meeting Group 3 - Suppliers control

Round table

- Name
- Organisation
- Role
- Expectations

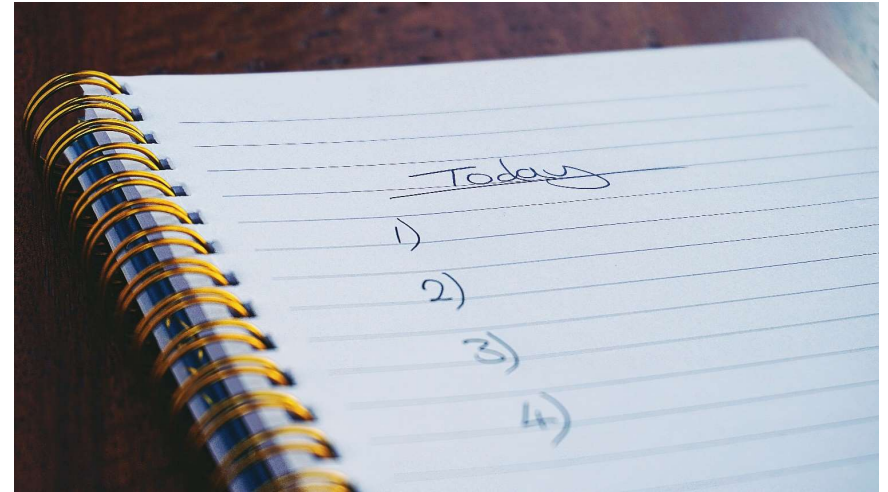


Part-21 Implementation Workshop

Side meeting Group 3 - Suppliers control

Subjects of discussion

- Design Organisation
- Regulatory Requirements
- Scope of Subcontracting
- Means of Compliance
- Independent Monitoring Function
- Direct Oversight
- Level of authorisation and involvement
- Access and Investigation



Design Organisation ≠ DOA Holder

- The design organisation is not the registered legal entity holding the **DO Approval**. It is wider.....
- A design organisation is the ensemble of all people and resources necessary to design and certify a product, part or equipment, and therefore it encompass also the organisations of design subcontractors (if any).
- The legal entity holding the DOA has set up a virtual organisation with partners and subcontractors to perform design and certification activities aiming at the obtainment of a design approval (e.g. TC, Major change, ETSOA, etc.)

Regulatory Requirements

- All design and certification activities aiming at the obtainment of a design approval (i.e. TC, major change, etc.) are subject to compliance with Part-21 requirements, as applicable, regardless of where and by whom are performed within the design organisation.
- It is the responsibility of the holder of the DOA to ensure those activities are performed in compliance with the applicable Part 21 requirements

Scope of Subcontracting

- The DOA holder should define the scope of subcontracted activities (including authorisations to grant) and identify the applicable Part-21 requirements, those activities are subject to.
- The DOA holder should therefore request subcontractors to ensure compliance with:
 - those Part-21 requirements or;
 - “translated” / adapted requirements from Part 21

Means of Compliance

- The subcontractor should be requested to identify the means of compliance to those requirements (ideally via a check-list for supervision purposes)
- These means might be:
 - The subcontractor procedures, if adequate; or
 - Ad-hoc procedural provisions (documented in a DOID and distributed internally with a quality plan complementing standard subcontractor procedures)



Independent Monitoring Function

- The subcontractor may be required to independently monitor the compliance and adequacy of those identified means of compliance
- This task should be performed in accordance with a procedure agreed with the DOA holder and documented in the DOID
- The subcontractor should be requested to report back the results of that monitoring.

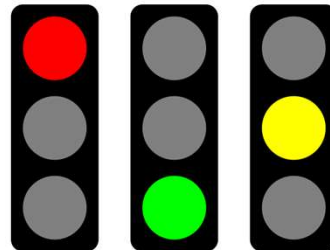


Direct Oversight by IMF

- The DOA holder IMF may decide to have direct oversight of the subcontractor's organisation
- In that case the DOA holder should define frequency of oversight of the supplier, based on risk, evaluated regularly.

Level of authorisations and involvement

- The DOA holder should establish:
 - the level of involvement into subcontracted design and certification activities and,
 - the level of authorisations granted to suppliers
 - these levels should be based on regular assessment of intrinsic risks of the activity itself, of the competences and capabilities of the subcontractors, and of its performance in the execution of those activities.



Access and Investigation

- Access to data and facilities (21.A.9) used by subcontractors in the execution of the related activities must be ensured via robust contractual clauses.



Thank you for your participation

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