

Answers to the most voted questions raised via Sli.do during the EASA Certification & DOA workshop 2021 that were not addressed during the event



Will the DOA-Organisations have to perform internal SMS-audits?

Yes, Point 21.239(e) will contain the requirement for the design organisation to perform internal SMS-Audits:

(e) The design organisation shall establish, as part of the design management system, an independent monitoring function to verify compliance of the organisation with the relevant requirements of this Annex as well as the compliance with and adequacy of the design management system. Monitoring shall include feedback to the person or the group of persons referred to in point 21.A.245(b) and to the manager referred to in point 21.A.245(a) to ensure, where necessary, the implementation of corrective action.

SMS will bring about a fundamentally different approach: the surveillance is not only compliance-based but also performance based with a focus on the Safety Risk management process and its relationship with performance supported by the outcome of the data collection and analysis. Specific training tailored to those performing SMS 'assessments' will have to be developed.

Parts without a Form-1. Do these parts also not need EPA marking?

As specified in point 21L.A.252, the markings for all parts are required to be included within the design data for the part. Parts that are not required to be accompanied by an authorised release certificate (EASA Form 1) in accordance with point 21L.A.193 (b) are still required to comply with the provisions of Part 21 Light Subpart Q as stated in point 21L.A.193 (a)(2). Therefore, a part that is not required to be accompanied by an authorised release certificate (EASA Form 1) shall still comply with the markings specified in the design data. Part 21 Light does not include any specific EPA marking requirements and the required markings for the part will be defined by the design holder/declarant in the design data.

Can we use generic STC 's of other DOA's (for example using Stretcher STC 's for installation) on our projects ? If yes could you explain how?

Yes, STCs are not required to be installed by the STC Holder. However a permission of the STC Holder is required, which also states that the installer has the latest set of necessary STC data and instructions.

If this "third-party" STC is used within an own DOA project, there will be a limitation in the approval stating that this STC is a pre-requisite for the installation of the own STC.

The installer of the "third-party" STC, shall verify that the pre-mod configuration is suitable for that installation and eventually design the change covering the delta of configuration with the STC's pre-mod configuration.

In addition, the type / model need to be part of the STC.

We need DDP documents for compliance demonstration but we encounter many problems to reach these documents. Equipment owner companies refuse to send this document. Do you have any plan or advice to solve this issue? Maybe all ETSO DDP documents can be collected from one link like the TCDS.

In accordance with point 21.A.605(a)3, the DDP for an ETSO (and referred documents) must be provided by the ETSO applicant to EASA, but those are proprietary documents shared between the applicant and EASA and cannot be published by EASA. However, in many cases the ETSO Authorisation Holder publishes other documents for the benefit of the installer, like "Installation Instructions and Limitations" document (sometimes included in the Component Maintenance Manual). These latest documents are the ones for the support of the installer.

Is awkward an applicant witnessing a test or inspection of its own plan; even if controlled in accordance with point 21.A.239 (c). CM-21.A-B-001 nominates the CVE role on behalf of EASA for the tasks of 21.A.257 (b). Shouldn't the CM mention the remote techs aiming the DAS instead of the CVE?

The certification memorandum reads '...**As an example**, this scenario can occur in the framework of the activities defined in point 21.A.239 (b) ... by compliance verification engineers.'

EASA does not consider that an update of the certification memorandum is needed as this represents a typical scenario (i.e. an example) when a remote witnessing activity is performed by the applicant without EASA involvement.