EASA

Comment Response Tool

Title	Other party supplier control
NPA Number	NPA 2010-01

UK CAA (UK CAA, European.Affairs@caa.co.uk) has placed **6** reactions on this NPA:

NPA Pag (s)	Reaction to	Reaction	Attachments
0	(general reactions)	**Page 3 - Paragraph No: IV. 8** **Comment:** Further clarity is required in order to ensure that organisations clearly understand that the intent of the NPA is to reduce duplication of audits of the *quality system* but does not address product conformity. The example quoted in the second paragraph of 8 is a good case in point. Just because a supplier is "well organised" is not a guarantee of product conformity (See RLD comment 24.4). A judgement on whether to accept incoming material on the basis of supplier documentation and data must be made on the basis of *risk* – primarily the risk to airworthiness of the part and the risk posed by the quality system of the supplying organisation. The example states that full-scale incoming inspection by the POA holder could be necessary when there is no adequate control of that supplier. If there was no adequate control of the supplier, then complete conformity checks by the POA holder would be the only way to meet 21A.139(b)(1). **Proposed Text:** It is recommended that specific wording be included to make it clear that the NPA applies only to demonstration of the working of the quality system as part of a risk based approach to supplier control which must also include the demonstration of product conformity.	
0	comment **#25** by on segment "**(General Comments)**"	**Page 4 - Comment 25 (Embraer)** **Comment:** It's noted that Embraer supports the proposal as eliminating duplication of effort *thus saving resources that can be redirected to other safety matters.* CAA wholeheartedly concurs with this sentiment, but this objective – i.e. to release resource to other areas such as product conformity issues and technical capability checks of supplier competence does not seem to be reflected in the current NPA. This was a stated objective of the prior JAA arrangements to obtain NAA support. **Justification:** Previously stated CAA concern has been that organisations will reduce numbers of supplier QA personnel rather than redirect to areas of safety improvements such as product audits. **Proposed Text:** The intent to redirect resource to seek improved product conformity should be restated as a specific objective.	
4-6	comment **#24** by on segment "**A. Explanatory Note - IV. Content of the**	**Page 9 - Comment 24 (RLD) 4. (+ 29 FOCA)** **Comment:** CAA UK has similar experience regarding varying standards of compliance of	

	draft opinion/decision"	those organisations holding EN/AS9100 certification to that of RLD and has passed this to Industry via the National Certification Management Body on which it sits. The Agency should consider a qualification audit of the functioning of the ICOP system with the results available to NAAs as part of their decision-making process. Consideration should be given to the use of NAA personnel to support Agency resource. **Justification:** To reduce possible inconsistencies between implementation of the certification schemes within member states (as noted in the FOCA comment),	
13-14	the response to comment **#33** by on segment "**B. Draft Decision - AMC No. 1 to 21A.139(b)(1)(ii)**"	**Page 20 - Response to Comment 33 (Claude Mas)** **Comment:** Mention is made of EASA plans to organise a workshop shortly after publication to discuss consistent implementation. CAA UK considers this essential in order to ensure standardisation and common understanding between NAAs and the Agency. **Justification:** Standardisation.	
15-16	comment **#22** by on segment "**B. Draft Decision - AMC No. 2 to 21A.139(b)(1)(ii)**"	**Page 26 - Comment 22 (UK CAA)** **Comment:** CRD response states that AMC No. 2 lists the criteria used such that oversight by an other party scheme "can be used to substitute the assessment, audit and control of the POA Holder." Other party oversight cannot substitute for the control of the POA Holder, which remains their legal obligation under 21A.139. Such a comment gives CAA concern that there is not a clear understanding of exactly what the intent of this NPA is. It is <u>not</u> to replace the assessment, audit and control of the POA Holder, it is to allow an element (i.e. the assessment of the quality system) to be delegated to another organisation under controlled conditions). CAA remains concerned that this NPA will be commonly misinterpreted as simply meaning that a supplier with EN/AS9100 needs no oversight at all – hence the other comments regarding clarity of purpose. **Justification:** Lack of clear statement of intent of NPA will lead to inconsistent application and confusion.	
15-16	the resulting text for segment "**B. Draft Decision - AMC No. 2 to 21A.139(b)(1)(ii)**"	**Page 33/34 - Resulting text to AMC No. 2 to 21A.139(b)(1)(ii) paragraph 3(c)(3)(i)** **Comment: If this paragraph is intended to make sure that no gaps will occur between the assessment, audit and control performed by the OP and the POA holder, then clear guidance may be beneficial. A similar comment may be applied to the corresponding text in AMC No. 1 to 21A.139 (b)(1)(ii).** **Justification: Clear guidance to make sure that no gaps will occur between the assessment, audit and control performed by the OP and the POA holder.**	

		Proposed Text: Replace existing text with the following: **"(i) Verification that certification standards and checklists are acceptable and applied to the applicable scope, and include all applicable elements of Part 21 Subpart G e.g.** · **Mandatory Occurrence Reporting and continued airworthiness,** · **Co-ordination with the POA or holder of, an approved design** · **Issue of certifications within the scope of approval.** · **Incorporation of airworthiness data in production and inspection data** · **When applicable, ground test products in accordance with procedures defined by the POA, or holder of, the design approval** · **Procedures for traceability including a definition of clear criteria of which items need such traceability. "**	

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