**PART 21 SUBPART G PRODUCTION ORGANISATION APPROVAL COMPLIANCE CHECK LIST**

*For organisation use only*

**Applicant/Organisation:**

**Approval reference:** IT.21G.

**POE reference:**

**Additional information/comments (if any):**

**Compiled by:**

**Date:**

*For ENAC use only*

**POATL:**

**Additional information/comments (if any):**

**Checklist reviewed by:**

**Date:**

**Signature:**

**DEFINITIONS**

* **“New” Part 21**: Commission Regulation (EU) No 748/2012 and its Annex I (Part 21), as amended by Commission Implementing Regulation (EU) 2022/203, Commission Delegated Regulation (EU) 2022/201, and Commission Implementing Regulation (EU) 2022/1253).
* **“Old” Part 21:** Commission Regulation (EU) No 748/2012 and its Annex I (Part 21), prior to the amendments introduced by Commission Implementing Regulation (EU) 2022/203, Commission Delegated Regulation (EU) 2022/201, and Commission Implementing Regulation (EU) 2022/1253).
* **Classical provision**: requirement already laid down in “old” Part 21 (although the reference to the regulatory paragraph might have changed). In case of identified non-compliances against “classical” provisions (requirements not impacted by the new regulation), EASA will raise findings as per the usual process.
* **Novelty**: new requirements introduced by “new” Part 21. In case of identified non-compliances against “novelties” (new requirements), such findings will be covered by a generic transition finding.
* **Transition finding**: ENAC will raise a generic “SMS transition finding” (instead of raising non-compliances against each individual regulatory paragraph introduced by the new Regulation). The due date of this finding will be set to 7 March 2025; however, Organisations are strongly encouraged to provide their corrective actions as early as possible before the finding deadline.
* **Means of compliance (POE, associated procedure)**: organisations are required to make reference to the relevant chapters/paragraphs of the draft POE and associated procedures that incorporate new SMS requirements.

The draft POE and associated procedures will be subject to review as part of the Significant Change required for approval of SMS.

* Blocks in grey are for ENAC use only and should not be modified by organisations.
* Mark as “N/A” those regulatory paragraphs that are not applicable to the scope of the organisation.

For example, organisations holding only C1 or C2 ratings should mark “N/A” those regulatory paragraphs that are related to production of complete aircraft (e.g., EASA Form 52, EASA Form 53, Permit to Fly…)

* **Applicants for an initial POA**. The application and related investigation are expected to comply with the “new” Part 21. The initial approval certificate can only be issued once compliance with Regulation (EU) 2022/201 has been demonstrated and verified.

**ADDITIONAL NOTES:**

Certain regulatory requirements are marked in the checklist as both “Classical provision” and “Novelty”:

* **(\*1):** With the new requirements, a production organisation is required to establish, implement and maintain a production management system that includes a safety management element and a quality management element.
  + The classical provisions refer to the quality management element, which is not covered by the Transition finding
  + The novelty refers to the safety management element and is covered by the Transition finding.
* **(\*2):** With the new requirements, following notification of a finding a production organisation is required to identify the root cause(s) of, and contributing factor(s) to, the non-compliance and define a corrective action plan.

Although such requirements are new in the regulation, the requirement for root cause analysis and corrective action plan were already included in UG.POA.00067 “User Guide for Production Organisations”

* **(\*3):** The requirements on the internal occurrence reporting system have now been expanded to also include “reports on errors, near misses and hazards”.
* **(\*4):** The requirements to “retain records of the authorisation of personnel” have now been expanded to include, not only Certifying Staff, but any personnel that “exercise the privileges of the approved organisation pursuant to points 21.A.163”. Since privilege 21.A.163(a) is to “perform production activities”, it is therefore expanded to cover all personnel involved in production and not only Certifying Staff.
* **(\*5):** The template of the EASA Form 52 has been revised and up-issued to “EASA Form 52 – Issue 3”
* **(\*6):** Ref. to Commission Delegated Regulation (EU) 2022/1358

| **“New” Part 21** | **“Old” Part 21** | **Classical**  **provision** | **Novelty** | **Means of compliance** | | **Remarks** | **Compliant (Y/N)** |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Ref to POE paragraph** | **Associate procedures** |
| **SCOPE** | | | | | | | |
| 21.A.131 | 21.A.131 | X | - |  |  |  |  |
| **ELIGIBILITY** | | | | | | | |
| 21.A.133(a) | 21.A.133(a) | X | - |  |  |  |  |
| 21.A.133(b) | 21.A.133(b) | X | - |  |  |  |  |
| 21.A.133(c) | - | - | -  (\*6) | N/A | N/A | N/A | N/A |
| 21.A.133(d)(1) | 21.A.133(c) | X | -  (\*6) |  |  |  |  |
| 21.A.133(d)(2) | - | - | -  (\*6) | N/A | N/A | N/A | N/A |
| **APPLICATION** | | | | | | | |
| 21.A.134 | 21.A.134 | X | - |  |  |  |  |
| **MEANS OF COMPLIANCE** | | | | | | | |
| 21.A.134A(a) | - | - | X |  |  |  |  |
| 21.A.134A(b) | - | - | X |  |  |  |  |
| **ISSUANCE OF PRODUCTION ORGANISATION APPROVAL** | | | | | | | |
| 21.A.135 | 21.A.135 | X | - |  |  |  |  |
| **PRODUCTION MANAGEMENT SYSTEM** | | | | | | | |
| 21.A.139(a) | 21.A.139(a) | X | X  (\*1) |  |  |  |  |
| 21.A.139(b)(1) | - | - | X |  |  |  |  |
| 21.A.139(b)(2) | - | - | X |  |  |  |  |
| 21.A.139(c)(1) | - | - | X |  |  |  |  |
| 21.A.139(c)(2) | - | - | X |  |  |  |  |
| 21.A.139(c)(3) | - | - | X |  |  |  |  |
| 21.A.139(c)(4)(i) | - | - | X |  |  |  |  |
| 21.A.139(c)(4)(ii) | - | - | X |  |  |  |  |
| 21.A.139(c)(4)(iii) | - | - | X |  |  |  |  |
| 21.A.139(c)(5)(i) | - | - | X |  |  |  |  |
| 21.A.139(c)(5)(ii) | - | - | X |  |  |  |  |
| 21.A.139(c)(6) | - | - | X |  |  |  |  |
| 21.A.139(d)(1) | 21.A.139(a) | X | - |  |  |  |  |
| 21.A.139(d)(2)(i) | 21.A.139(b)(1)(i) | X | - |  |  |  |  |
| 21.A.139(d)(2)(ii) | 21.A.139(b)(1)(ii) | X | - |  |  |  |  |
| 21.A.139(d)(2)(iii) | 21.A.139(b)(1)(iii) | X | - |  |  |  |  |
| 21.A.139(d)(2)(iv) | 21.A.139(b)(1)(iv) | X | - |  |  |  |  |
| 21.A.139(d)(2)(v) | 21.A.139(b)(1)(v) | X | - |  |  |  |  |
| 21.A.139(d)(2)(vi) | 21.A.139(b)(1)(vi) | X | - |  |  |  |  |
| 21.A.139(d)(2)(vii) | 21.A.139(b)(1)(vii) | X | - |  |  |  |  |
| 21.A.139(d)(2)(viii) | 21.A.139(b)(1)(viii) | X | - |  |  |  |  |
| 21.A.139(d)(2)(ix) | 21.A.139(b)(1)(ix) | X | - |  |  |  |  |
| 21.A.139(d)(2)(x) | 21.A.139(b)(1)(x) | X | - |  |  |  |  |
| 21.A.139(d)(2)(xi) | 21.A.139(b)(1)(xi) | X | - |  |  |  |  |
| 21.A.139(d)(2)(xii) | 21.A.139(b)(1)(xii) | X | - |  |  |  |  |
| 21.A.139(d)(2)(xiii) | 21.A.139(b)(1)(xiii) | X | - |  |  |  |  |
| 21.A.139(d)(2)(xiv) | 21.A.139(b)(1)(xiv) | X | - |  |  |  |  |
| 21.A.139(d)(2)(xv) | 21.A.139(b)(1)(xv) | X | - |  |  |  |  |
| 21.A.139(d)(2)(xvi) | 21.A.139(b)(1)(xvi) | X | - |  |  |  |  |
| 21.A.139(d)(2)(xvii) | 21.A.139(b)(1)(xvii) | X | - |  |  |  |  |
| 21.A.139(d)(3) | 21.A.139(b)(1)  (Critical parts) | X | - |  |  |  |  |
| 21.A.139(e) | 21.A.139(b)(2) | X | X  (\*1) |  |  |  |  |
| 21.A.139(f) | - | - | X |  |  |  |  |
| **PRODUCTION ORGANISATION EXPOSITION** | | | | | | | |
| 21.A.143(a) | 21.A.143(a) | X | X  (\*1) |  |  |  |  |
| 21.A.143(a)(1) | 21.A.143(a)(1) | X | - |  |  |  |  |
| 21.A.143(a)(2) | 21.A.143(a)(2) | X | - |  |  |  |  |
| 21.A.143(a)(3) | 21.A.143(a)(3) | X | - |  |  |  |  |
| 21.A.143(a)(4) | 21.A.143(a)(4) | X | - |  |  |  |  |
| 21.A.143(a)(5) | 21.A.143(a)(5) | X | - |  |  |  |  |
| 21.A.143(a)(6) | 21.A.143(a)(6) | X | - |  |  |  |  |
| 21.A.143(a)(7) | 21.A.143(a)(7) | X | - |  |  |  |  |
| 21.A.143(a)(8) | 21.A.143(a)(8) | X | - |  |  |  |  |
| 21.A.143(a)(9) | 21.A.143(a)(9) | X | - |  |  |  |  |
| 21.A.143(a)(10) | 21.A.143(a)(10) | X | - |  |  |  |  |
| 21.A.143(a)(11) | 21.A.143(a)(11) | X | X  (\*1) |  |  |  |  |
| 21.A.143(a)(12) | 21.A.143(a)(12) | X | - |  |  |  |  |
| 21.A.143(a)(13) | 21.A.143(a)(13) | X | - |  |  |  |  |
| 21.A.143(b) | - | - | X |  |  |  |  |
| 21.A.143(c) | 21.A.143(b) | X | - |  |  |  |  |
| **RESOURCES** | | | | | | | |
| 21.A.145(a) | 21.A.145(a) | X | - |  |  |  |  |
| 21.A.145(b)(1) | 21.A.145(b)(1) | X | - |  |  |  |  |
| 21.A.145(b)(2) | 21.A.145(b)(2) | X | - |  |  |  |  |
| 21.A.145(b)(3) | 21.A.145(b)(3) | X | - |  |  |  |  |
| 21.A.145(c)(1) | 21.A.145(c)(1) | X | X  (\*1) |  |  |  |  |
| 21.A.145(c)(2) | 21.A.145(c)(2) | X | X  (\*1) |  |  |  |  |
| 21.A.145(c)(3) | 21.A.145(c)(3) | X | - |  |  |  |  |
| 21.A.145(d)(1) | 21.A.145(d)(1) | X | - |  |  |  |  |
| 21.A.145(d)(2) | 21.A.145(d)(3) | X | - |  |  |  |  |
| Note:  The requirements in the “old” regulatory paragraph 21.A.145(d)(2) “the production organisation maintains a record of all certifying staff which shall include details of the scope of their authorisation;” are now laid down 21.A.5(e) under record-keeping requirements. | | | | | | | |
| **CHANGES IN THE PRODUCTION MANAGEMENT SYSTEM** | | | | | | | |
| 21.A.147 | 21.A.147(a) | X | - |  |  |  |  |
| Note:  The requirements in the “old” regulatory paragraph 21.A.147(b) “The competent authority shall establish the conditions under which a production organisation approved under this Subpart may operate during such changes unless the competent authority determines that the approval should be suspended” are now laid down in 21.B.240(b) under Procedures for Competent Authorities concerning Changes in Production Management System. | | | | | | | |
| **CHANGES OF LOCATION** | | | | | | | |
| 21.A.148 | 21.A.148 | X | - |  |  |  |  |
| **TRANSFERABILITY** | | | | | | | |
| 21.A.149 | 21.A.149 | X | - |  |  |  |  |
| **TERMS OF APPROVAL** | | | | | | | |
| 21.A.151 | 21.A.151 | X | - |  |  |  |  |
| **CHANGES TO THE TERMS OF APPROVAL** | | | | | | | |
| 21.A.153 | 21.A.153 | X | - |  |  |  |  |
| ***(21.A.157 INVESTIGATIONS)*** | | | | | | | |
| Note:  The requirements in the “old” regulatory paragraph 21.A.157 are now laid down in 21.A.9 under Access and Investigation requirements. | | | | | | | |
| **FINDINGS AND OBSERVATIONS** | | | | | | | |
| 21.A.158(a)(1) | - | - | X  (\*2) |  |  |  |  |
| 21.A.158(a)(2) | - | - | X  (\*2) |  |  |  |  |
| 21.A.158(a)(3) | 21.A.158(c)(1)  21.A.158(c)(2) | X | - |  |  |  |  |
| 21.A.158(b) | 21.A.158(c)(1)  21.A.158(c)(2) | X | - |  |  |  |  |
| 21.A.158(c) | - | - | X |  |  |  |  |
| Note:  The requirements in the “old” regulatory paragraphs 21.A.158(a)(1) and 21.A.158(a)(2) are now laid down in 21.B.225(b) and 21.B.225(c) under Procedures for Competent Authorities concerning Findings and corrective actions; observations.  The requirements in the “old” regulatory paragraph 21.A.158(d) are now laid down in 21.B.225(d) under Procedures for Competent Authorities concerning Findings and corrective actions; observations.  The requirements in the “old” regulatory paragraphs 21.A.158(b) and 21.A.158(c)(3) concerning Level 3 findings are removed from the Regulation. | | | | | | | |
| **DURATION AND CONTINUED VALIDITY** | | | | | | | |
| 21.A.159(a) | 21.A.159(a) | X | - |  |  |  |  |
| 21.A.159(b) | 21.A.159(b) | X | - |  |  |  |  |
| **PRIVILEGES** | | | | | | | |
| 21.A.163(a) | 21.A.163(a) | X | - |  |  |  |  |
| 21.A.163(b) | 21.A.163(b) | X | - |  |  |  |  |
| 21.A.163(c) | 21.A.163(c) | X | - |  |  |  |  |
| 21.A.163(d) | - | - | -  (\*6) | N/A | N/A | N/A | N/A |
| 21.A.163(e) | - | - | -  (\*6) | N/A | N/A | N/A | N/A |
| 21.A.163(f) | 21.A.163(d) | X | -  (\*6) |  |  |  |  |
| 21.A.163(g) | 21.A.163(e) | X | -  (\*6) |  |  |  |  |
| **OBLIGATIONS OF THE HOLDER** | | | | | | | |
| 21.A.165(a) | 21.A.165(a) | X | - |  |  |  |  |
| 21.A.165(b) | 21.A.165(b) | X | - |  |  |  |  |
| 21.A.165(c)(1) | 21.A.165(c)(1) | X | - |  |  |  |  |
| 21.A.165(c)(2) | 21.A.165(c)(2) | X | - |  |  |  |  |
| 21.A.165(c)(3) | 21.A.165(c)(3) | X | - |  |  |  |  |
| 21.A.165(c)(4) | 21.A.165(c)(4) | X | - |  |  |  |  |
| 21.A.165(d) | 21.A.165(g) | X | - |  |  |  |  |
| 21.A.165(e) | 21.A.165(i) | X | - |  |  |  |  |
| 21.A.165(f) | 21.A.154(j) | X | - |  |  |  |  |
| 21.A.165(g) | 21.A.165(k) | X | - |  |  |  |  |
| 21.A.165(h) | - | - | X |  |  |  |  |
| Note:  The requirements in the “old” regulatory paragraphs 21.A.165(d) and 21.A.165(h) are now laid down in 21.A.5 under Record-keeping requirements.  The requirements in the “old” regulatory paragraphs 21.A.165(e), 21.A.165(f)(1), 21.A.165(f)(2), 21.A.165(f)(3) are now laid down in 21.A.3A under Reporting system requirements. | | | | | | | |
| **REPORTING SYSTEM** | | | | | | | |
| 21.A.3A(b)(1) | 21.A.165(e) | X | X  (\*3) |  |  |  |  |
| 21.A.3A(b)(2) | 21.A.165(f)(1) | X | - |  |  |  |  |
| 21.A.3A(b)(3) | 21.A.165(f)(2)  AMC 20-8A | X | - |  |  |  |  |
| 21.A.3A(b)(4) | 21.A.165(f)(3) | X | - |  |  |  |  |
| 21.A.3A(c) | - | - | X |  |  |  |  |
| 21.A.3A(d) | 21.A.3A(b)(2)  21.A.165(f)(2)  AMC 20-8A | X | - |  |  |  |  |
| 21.A.3A(e) | 21.A.3A(c)(1)  21.A.165(f)(2)  AMC 20-8A | X | - |  |  |  |  |
| 21.A.3A(f) | 21.A.3A(c)(2) | X | - |  |  |  |  |
| **RECORD-KEEPING** | | | | | | | |
| 21.A.5(b) | 21.A.165(d)  21.A.165(h) | X | - |  |  |  |  |
| 21.A.5(c)(1) | 21.A.729(a) | X | - |  |  |  |  |
| 21.A.5(c)(2) | 21.A.729(b) | X | - |  |  |  |  |
| 21.A.5(d)(1) | - | - | X |  |  |  |  |
| 21.A.5(d)(2) | - | - | X |  |  |  |  |
| 21.A.5(d)(3) | - | - | X |  |  |  |  |
| 21.A.5(e)(1) | 21.A.145(d)(2) | X | X  (\*4) |  |  |  |  |
| 21.A.5(e)(2) | - | - | X |  |  |  |  |
| **ACCESS AND INVESTIGATION** | | | | | | | |
| 21.A.9(a) | 21.A.157  21.A.165(h)  21.A.721 | X | - |  |  |  |  |
| 21.A.9(b) | 21.A.157 | X | - |  |  |  |  |
| **PERMIT TO FLY** | | | | | | | |
| 21.A.701(a) | 21.A.701(a) | X | - |  |  |  |  |
| 21.A.701(b) | 21.A.701(b) | X | - |  |  |  |  |
| 21.A.708(a) | 21.A.708(a) | X | - |  |  |  |  |
| 21.A.708(b) | 21.A.708(b) | X | - |  |  |  |  |
| 21.A.708(c) | 21.A.708(c) | X | - |  |  |  |  |
| 21.A.708(d) | 21.A.708(d) | X | - |  |  |  |  |
| 21.A.710(b) | 21.A.710(b) | X | - |  |  |  |  |
| 21.A.710(c) | 21.A.710(c) | X | - |  |  |  |  |
| 21.A.711(c) | 21.A.711(c) | X | - |  |  |  |  |
| 21.A.711(e) | 21.A.711(e) | X | - |  |  |  |  |
| 21.A.711(f) | 21.A.711(f) | X | - |  |  |  |  |
| 21.A.711(g) | 21.A.711(g) | X | - |  |  |  |  |
| 21.A.713(a) | 21.A.713(a) | X | - |  |  |  |  |
| 21.A.713(b) | 21.A.713(b) | X | - |  |  |  |  |
| 21.A.715 | 21.A.715 | X | - |  |  |  |  |
| 21.A.719(a) | 21.A.719(a) | X | - |  |  |  |  |
| 21.A.723(a)(1) | 21.A.723(a)(1) | X | - |  |  |  |  |
| 21.A.723(a)(2) | - | - | X |  |  |  |  |
| 21.A.723(a)(3) | 21.A.723(a)(2) | X | - |  |  |  |  |
| 21.A.723(a)(4) | 21.A.723(a)(3) | X | - |  |  |  |  |
| 21.A.725 | 21.A.725 | X | - |  |  |  |  |
| 21.A.727 | 21.A.727 | X | - |  |  |  |  |
| Note:  The requirements in the “old” regulatory paragraph 21.A.721 are now laid down in 21.A.9 under Access and Investigation requirements.  The requirements in the “old” regulatory paragraphs 21.A.729(a) and 21.A.729(b) are now laid down in 21.A.5(c)(1) and 21.A.5(c)(2) under Record-keeping requirements.  The title of 21.A.711 has been modified to “Issuance of a permit to fly” (previous title was “Issue of a permit to fly”) | | | | | | | |
| **APPENDIXES** | | | | | | | |
| Appendix I –  EASA Form 1 | Appendix I –  EASA Form 1 | X | - |  |  |  |  |
| Appendix IV –  EASA Form 20b | Appendix IV –  EASA Form 20b | X | - |  |  |  |  |
| Appendix VIII –  EASA Form 52 | Appendix VIII –  EASA Form 52 | X | X  (\*5) |  |  |  |  |
| Appendix IX –  EASA Form 53 | Appendix IX –  EASA Form 53 | X | - |  |  |  |  |