Becoming an EASA Part 21G POA Subcontractor

Sofema Aviation Services (SAS) Considers the process whereby an organization may enter the field of Aerospace Production without holding an EASA Part 21 G approval

Introduction - Acting as a subcontractor to an existing POA is one way that an organisation may enter the aerospace production environment with limited exposure.

Acting as a subcontractor offers a viable, low-overhead pathway into aerospace production, providing an opportunity to master critical industry quality practices. However, this model fundamentally shifts the regulatory burden of certification and ultimate compliance onto the primary POA holder, who must maintain rigorous and comprehensive oversight of all subcontracted activities to mitigate significant legal and safety risks.

Joining the aerospace production environment as a subcontractor to an existing EASA Production Organisation Approval (POA) holder is a common and often strategic entry point.

- This method allows an organization to participate in the production of certified aircraft parts and appliances without holding its own POA, which entails significant regulatory overhead.
- This arrangement comes with a distinct set of opportunities for growth and market entry, as well as critical challenges centered on regulatory compliance, quality control, and liability.

Opportunities Related to Subcontracting

Subcontracting offers several significant benefits, particularly for smaller or newly established organizations:

Market Entry and Experience:

- **Lower Barrier to Entry:** Avoids the time, cost, and complexity of directly obtaining and maintaining a full EASA POA (Part 21 Subpart G). This immediately grants access to certified production work.
- **Exposure to Aviation Standards:** Provides hands-on experience working within a rigorously controlled environment, accelerating the organization's understanding of EASA Part 21 quality and safety requirements.

- **Build a Track Record:** Successfully serving an established POA holder builds a critical reference and reputation within the regulated aerospace supply chain.

Reduced Regulatory Burden:

- Focus on Production: The subcontractor can focus primarily on the technical aspects of production, as the ultimate responsibility for compliance and airworthiness certification (issuing the EASA Form 1) remains with the primary POA holder.

Leverage POA Holder's System: The subcontractor operates under the oversight and quality management system of the POA holder, benefiting from their established procedures and regulatory liaison.

Business Growth and Stability:

- **Secured Work:** Contracts with established POA holders often provide a secure and consistent volume of work.
- **Potential for Future POA:** The experience gained working with the EASA framework and demonstrating competence in Part 21 processes is invaluable if the organization later chooses to pursue its own full POA.

Challenges of Subcontracting

The regulatory framework ensures that while the POA holder may delegate the manufacturing task (outsourcing the work), they never delegate the airworthiness responsibility (retaining the ultimate legal and technical liability).

- This tight control mechanism is what allows non-approved organisations to participate in the certified aerospace supply chain.
- Despite the benefits, the subcontractor relationship introduces major risks and operational demands, primarily for the POA holder, but also for the subcontractor.

Control and Oversight:

- **Primary Responsibility:** The POA holder retains full legal responsibility for the conformity of the final product, including the parts produced by the subcontractor. This means the POA holder must implement robust and costly subcontractor assessment, audit, and control processes.

- **Lack of Certification Privilege:** The subcontractor is not permitted to issue the EASA Form 1 (Authorised Release Certificate). All conformity sign-off must be performed by the POA holder's certifying staff, often requiring them to manage and oversee the final release process at the subcontractor's facility (if permitted by the POA's Exposition).

Quality and Compliance Risks:

- **Maintaining Consistency:** Ensuring the subcontractor's quality system, procedures, tooling, and personnel training are consistently aligned with the POA holder's high standards and the approved design data is a constant challenge.
- **Communication Interface:** Poor communication and unclear contractual definitions regarding the scope of work, approved design data, and required technical standards can lead to non-conformities and delays.
- **Liability Issues:** In the event of an incident or non-conformity caused by the subcontracted work, while the POA holder is responsible to the Authority, liability can become a contentious contractual issue between the two organizations. Clear indemnity and liability clauses are essential.

Dependency and Scope Limitations (for the Subcontractor):

- **Limited Autonomy:** The subcontractor's operations are strictly limited by the contract and the POA holder's procedures, leading to reduced operational flexibility compared to an independent POA.
- **Supplier Risk:** The financial and operational stability of the subcontractor becomes a risk factor for the POA holder, requiring continuous monitoring.

Control Expectations Related to POA Subcontracting

The EASA Production Organisation Approval (POA) requirements for controlling subcontractors are rigorous because the POA holder retains 100% of the airworthiness responsibility.

- The core requirements for managing this relationship are detailed primarily in Part 21 Subpart G, specifically in relation to the Production Management System (PMS).

Key EASA Part 21 Requirements for Subcontractor Control

The rules mandate that the POA holder must integrate the subcontractor's activities into its own approved system as if the work were performed in-house.

The Production Management System (PMS)

The most critical requirement is found **under 21.A.139 - Production management system.** This provision mandates that the POA holder's management system must include procedures for the:

Vendor and Subcontractor Assessment, Audit, and Control (21.A.139(d)(2)(ii)): This is the heart of the control process. The POA must have documented procedures for:

- **Initial Assessment:** Rigorous evaluation of a potential subcontractor's capabilities, facilities, personnel competence, and their existing quality management system *before* engaging them.
- **Auditing and Surveillance:** Implementing a continuous **audit and surveillance program** to monitor the subcontractor's compliance with the POA holder's procedures and the applicable design data. This ensures the subcontractor maintains the required standard.
- **Control:** Establishing mechanisms to manage and control the flow of work, materials, and documentation to and from the subcontractor.

Conformity and Certification

The central principle of production approval is the assurance of conformity to approved design data.

- **Ultimate Responsibility (21.A.165):** The POA holder's primary obligation is to ensure that every product, part, or appliance released is in conformity with the applicable design data and in a condition for safe operation. This responsibility *cannot* be delegated to the subcontractor.
- **Release of Products (EASA Form 1):** Subcontractors do not have the privilege to issue the EASA Form 1 (Authorised Release Certificate).
    - The POA holder's authorised certifying staff must perform the final inspection and sign the EASA Form 1, thereby formally taking legal

responsibility for the conformity of the part, even if it was manufactured off-site by the subcontractor.

Procedural and Documentation Control

The POA holder must treat the subcontractor as an extension of their own facility, requiring comprehensive procedures documented in the Production Organisation Exposition (POE).

- Flow-down of Requirements: The POA holder's contract or work order with the subcontractor must explicitly flow down all relevant EASA Part 21 requirements. This includes:
    - Mandatory use of the POA holder's approved production processes.
    - Compliance with calibration of tools and equipment.
    - Control of non-conforming items.
    - Mandatory internal reporting of occurrences and non-conformities (Safety Management System elements).
- **Design Data Control:** Procedures must ensure the subcontractor is always working with the correct and most current revision of the approved design data provided by the Design Organisation Approval (DOA) holder.
- **Record-Keeping (21.A.5):** The POA holder is responsible for maintaining all production records, including those generated by the subcontractor, for the required retention period.

Technical and Resource Oversight

- **Personnel Competence:** The POA holder must ensure that the subcontractor's personnel performing tasks on their behalf are **competent** and trained in the necessary production processes and quality procedures.
- **Facilities and Environment (21.A.145):** The POA holder must verify that the subcontractor's facilities, equipment, and working environment are **suitable** to ensure the consistent conformity of the products being manufactured.