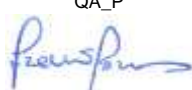



DOC. No : QD S000N0805E01		Issue P		WBS. No : 310		<u>Distribution list</u> NHI LH QA AH QA AHD QA FK QA Customers Doc focal points
<u>TITLE:</u> CONCESSION AND DEVIATION PERMIT PROCEDURE						
<u>Summary:</u> This procedure is the NH90 generic concession procedure made applicable by applicability sheet and / or contract related QAP. The same procedure applies for concessions and deviation permits. This procedure deals only with nonconformities on items to be delivered to the customer. This procedure is not applicable for nonconformities documentation after entry into service of an item. A Concession or Deviation Permit is no mean to introduce a change to the type design and is as consequence no alternative for a Design Change.						
EXPORT CONTROL: <input type="checkbox"/> ITAR <input type="checkbox"/> EAR <input type="checkbox"/> EU ML <input checked="" type="checkbox"/> N/A						
Applicability/Validity: <input checked="" type="checkbox"/> NHI <input checked="" type="checkbox"/> LH <input checked="" type="checkbox"/> AH/AHD <input checked="" type="checkbox"/> FK						
SDRC/LF Prepared by : <i>(name / position)</i> Signature : Date:					F. PORCU QA_P  10.02.2021	
Approved by : <i>(name / position)</i> Signature : Date :					A. LAUT  10.02.2021	
<div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;"><i>Delegated authority(ies)</i></div> Authorized by : <i>(name / position)</i> Signature : Date :	A. KLEISS QAT approval 10.02.2021 LH	A. HENS QAT approval 10.02.2021 AH	E. RAUHMEIER QAT approval 10.02.2021 AHD	R. VAN RUTTEN QAT approval 10.02.2021 FK	M. BECK QAT approval 10.02.2021 NHI	

Document Change Record

Issue	Issue date	Affected pages	CHANGE REASONS / ORIGINATORS CHANGE PROPOSAL / N°	Companies / Departments	Names
A	19/06/2001	ALL	FIRST ISSUE	NHI	GUIGNARD
B	08/11/2001	1 to 8, 10, 12 to 14	Introduction of NAHEMA/Nations comments	NHI	GUIGNARD
C	11/04/2002	See borders	Introduction of NAHEMA/Nations comments Industry improvements	NHI	GUIGNARD
D	13/06/2002	4, 6, 9, 11, 15 & 16	Introduction of NAHEMA/Nations comments Industry improvements	NHI	GUIGNARD
E	13/09/2006	ALL	Generic document for all contracts Accepted during Joint QAWG 49 held in Finland on 14th September 2006.	NHI	JEPPSON
F	23/04/2008	5, 6, 7, 10, 12	Added on about e-concession (see chap 7) further to NAHEMA and Nations agreements (QAWG Roma Feb 2008) + PC comments	NHI	JEPPSON
G	15/09/2009		NAH comment + PC comments QAT0905 + new §4.4.6 Airworthiness assessment	NHI	JEPPSON
H	25/11/2009	See borders	Update on FK request. Reviewed / approved during QAT0907	NHI	JEPPSON
I	28/04/2011	See borders	Adaptation of concession flow (Repairs) Agreement in JQAWG59 & JQAWG60 QAT1006 and QAT1102 inputs	NHI	JEPPSON
J	24/01/2012	See borders	NAHEMA/Nations on issue I , Industry inputs	NHI	JEPPSON
K	19/11/2012	See borders	Considering NAHEMA comments	NHI	MEVEL
L	22/05/2013	See borders	Considering NAHEMA/Nations comments	NHI	MEVEL
M	16/12/2013	See borders	Incorporating outcome of CO Workshops with NAH/Nations	NHI	MEVEL
N	09/09/2014	See borders	Incorporating outcome of CO Workshops with NAH/Nations	NHI	MEVEL
O	11/10/2017	See borders	PC name change (Leonardo) QAT1709 and QAT1710 inputs	NHI	PORCU
P	10/02/2021	See borders	General review of the procedure, in particular: <ul style="list-style-type: none"> • QAT 2002, 2006, 2010, 2011 outcomes; • NAH/Nations comments dated 08/02/2021 implemented; • Title and template updated; • § 5.1 General rules improved; • § 5.7 Marking of item updated; • § 5.8.2 Added S.S.L for VCI modification; • § 5.9 Cancellation of CO on L.C added; • Other minor changes highlighted in the text. 	NHI	PORCU

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1 SCOPE

This procedure is the NH90 generic [Concession and Deviation Permit](#) procedure made applicable by applicability sheet and / or contract related QAP.

[For temporary concessions refer to QD S000N0845E01.](#)

This procedure deals only with Nonconformities on items to be delivered to the customer.

A Concession or Deviation Permit is no mean to introduce a change to the type design and is as consequence no alternative for a Design Change.

When Outstanding Works/ In Advance Works are covered by dedicated TN or agreement letter forming part of the conformity documentation, it shall not be handled through [Deviation Permit / Concession](#).

Anomalies related to Acceptance tests specifications are not to be managed by Concession.

2 EFFECTIVITY

After release of each revision of this procedure the new initiated Concessions must comply with the requirements not later than 6 months after the release of the new issue.

As a principal, already released Concessions will not have to be updated unless required by SDR.

3 GENERAL

3.1 Introduction

All Nonconformities that need to be known by other Partner Companies/End Users outside the originating SMRC shall be [managed](#) in accordance with this procedure.

3.2 Terminology used

- **Administrative correction**
A correction of a typo mistake.
- **Buyer**
Company who places the Contract and purchase orders to the Supplier.
- **Concession** (ref. ISO 9000)
"Permission to use or release a product that does not conform to specified requirements"
Note: "Concession" should be read as "deviation permit" in this document, when applicable.
- **Deviation Permit** (ref. ISO 9000)
"Permission to depart from the originally specified requirements of a product prior to realisation."
Note: a deviation permit is generally given for a limited quantity of a product or a period of time and for a specific use (limited time to be mentioned, specific use condition if any).
- **End User**
Operating entity that uses, flies and/or maintains the H/C.
- **Nonconformity** (ref. ISO 9000)
"Non-fulfilment of a requirement" (against drawings, acceptance tests, ...)

▪ **Recordable concession**

A concession which the end user needs to be made aware of.

▪ **Non Recordable concession**

A concession which the end user does not need to be aware of.

▪ **Repair** (ref. ISO 9000)

“Action on a nonconforming product to make it acceptable for the intended use.”

Note:

- Replacement of a failed interchangeable part by a new one is not a repair;
- After a repair, the Type design (drawings/ specifications / etc.) is not fully restored
- *When a new part is repaired, it remains a new part.*

▪ **Rework** (ref. ISO 9000)

“Action on a nonconforming product to make it conform to the requirements” (drawings, etc.).

Note:

- Rework does not result in Concession.

▪ **Use as is**

This means that the part, for the nonconformity reported, has not been repaired and no (further) repair is necessary to use the part for its intended use. No repair attestation is required.

▪ **Use with repair**

This means that the part is usable for its intended use in the repaired condition and no further repair is necessary. A repair attestation is required.

3.3 List of Abbreviations

C-OL	Concession Operational Limitation
CVE	Compliance Verification Engineer
FAL	Final Assembly Line
GQA	Governmental Quality Assurance
H/C	Helicopter
JMAAN	Joint Military Aviation Authorities for NH90
NQAR	National Quality Assurance Representative
SDRC	System Design Responsible Company
SDRCQ	SDRC Quality
SMRC	System Manufacturing Responsible Company
TBO	Time Between Overhaul

3.4 Reference documents

- ISO 9000 Quality management systems - Fundamentals and vocabulary
- AQAP-2110 NATO Quality Assurance requirements for design, development and production
- AQAP-2070 NATO Mutual Government Quality Assurance (GQA)
- MD S000N0433E01 Management of the impact of a nonconformity on H/C operation

3.5 Applicable documents

- Contract
- QD S000N0872E01 Quality Assurance Manual for the NH90 programme
- [QD S000N0812E01](#) [Log Card procedure](#)
- MD N000N0415E01 Focal points/co-ordinators list
- MD S000N0453E01 Shipment & Hand over procedure
- MD S000N8412E01 Concession Cockpit Handbook
- MD 00 09 [NH90 Military](#) Design Organization Manual

4 ORGANISATION

4.1 Entry focal point

In each Partner Company, an «entry focal point» is nominated for its System Design Responsibility Company and has to be known by the other Partner Companies. He has to take care of correct processing of the concessions when SDRC is different from SMRC.

5 REQUIREMENTS

5.1 General rules

- All concessions shall be submitted to SDRC Office of Airworthiness or delegated authorised staff (such as CVE's or similar delegated personnel) for assessment of its impact on airworthiness and signature.
- Concessions, including any Annexes, that will be delivered to a Partner Company (as part of the component DDP) or the Customer shall be written in at least the English language.
- A concession shall relate to the lowest level of assembly or item undergoing nonconformity.
- It is possible to create:
 - one single concession for an affected part/assembly, with or without a S/N*, or
 - one single concession for a list of S/Ns / Batch of parts, in case the defect is the same for the full list / batch.

* in case of absence of a S/N, the number of the concession uniquely identifies the part/assembly.
- In case a part/assembly is affected by a different defect at the later point in time, then either
 - the original concession, or a part of it, is transferred into a new concession by grouping all defects, or
 - an additional concession can be created to cover the new defect.

In both cases, the concession(s) previously issued, regarding the part and particularly on the S/N under examination, it shall be analysed during the assessment of the new or additional concession.
- All Recordable concessions shall be referenced in the CoC or CoC/DAIN and item log card (or next higher assembly log card if any).
- Recording Industry decisions: The Concession form boxes with decision shall be filled with "Accepted" or "not accepted".
- Recording of customer representative acceptance may be completed by the reference of customer letter for decision if any.
- Every recordable concession "Industry Accepted" shall be submitted to the identified customer without delay.
- Industry shall submit the concession with information needed by the Customer representative/NQAR to know the concerned variant (info on concession, concession ref in the DDP, dedicated letter to the customer representative NQAR...) if available.
- The content of the concession must be self-sufficient for the reader understanding. Any additional information should be not necessary but when needed by the customer representatives it will be supplied.
- The Airworthiness statement is related to the part status as to be delivered to the customer as given on the concession. This is applicable whatever the SDRC Engineering disposition meaning "Use with Repair" or "Use as is".
- The block numbering, as mentioned in Annex 1, is to be considered as the sequence for the signature completion.
- It is strongly advised to segregate the signatories of the quality related boxes within the concession form.
- The signature for the SDRC advice and Airworthiness functions on the Concession shall not be from the same person.

5.2 Technical Assessment

The SDRC design office responsible for the definition file of the item involved is responsible for examining nonconformities and making the decision. According to sub-contracting conditions the SDRC may delegate the authority to an SDRC approved sub-contractor / supplier. From this assessment a decision shall be made by the authorized person whether to accept or reject the nonconforming part including defining whether a concession is necessary.

5.3 Originators Request

5.3.1 Describe non-conformance

The originator of the concession should be the organisation which detected the nonconformity(s) and is allowed to use its own numbering system.

The relevant form sheets are shown in Annex 1 first page and in Annex 2 (second page) and the procedure to fill in the concession form is shown in Annex 3.

The originator shall provide all necessary information related to the description of the part and nonconformity(s), particular attention should be paid to the following points:

- The description of the nonconformity and supporting drawings/sketches/photographs shall contain sufficient detail to allow the nonconformity and its location to be easily understood. All information shall be accurate and relevant.
- The part description shall correspond with that given on the drawing
- The corrective actions required to prevent a re-occurrence of the nonconformity.

On completion of the information, the originator attests, that it is correct by signing and dating the form.

The wording indicated in box 12 shall describe:

- Brief description of the initial nonconformity;
- Brief description and, when needed, reference to required repair;
- Brief description of residual nonconformity as it shall be delivered to the customer in comparison towards the approved design.

And identifies the cause of a nonconformity (e.g. damage, production anomaly) in a way that a proper assessment is possible (i.e. acronyms, referenced documents, etc. which are not known by customer representative shall be avoided e.g.).

Sufficient information in Box 12 on the first page of the Concession shall enable the understanding of the perimeter of the Nonconformity. More detailed information if appropriate shall be given on the following pages (attachments are allowed, not part of the page numbering of the concession) as referenced in box 12.

The nonconformity description shall permit to identify the localisation of the nonconforming area.

5.3.2 Numbering of concessions

CO

sequence
number

Issue

Indicative of the originator company:

A for AIRBUS HELICOPTERS
M for AIRBUS HELICOPTERS DEUTSCHLAND
F for FOKKER
G for LEONARDO HELICOPTERS

Concession sequence number and issue are according to Partner Company internal rules.

Nevertheless:

- Concessions are identified by a number in such a way that the same number cannot be used twice.
- The maximum total number of digits is limited to 15.
- For the first release of a concession the issue indication shall be "A" or "0".

Note: Depending on PC internal rules, sequence number could include additional letters and numbers.

In case of the unintended use of the same numbering for different concessions preferably the latest concession has to be reissued with a unique number.

5.3.3 Identification and segregation

As per PC internal rules.

5.4 Design Office Acceptance

5.4.1 Design Office Assessment

The decision shall be recorded on the concession form with all supporting drawings and sketches attached.

For mechanical and structural parts, the signature of stress department is mandatory on concessions related to safety class 1 parts.

When the item subject to nonconformity is acceptable with limitation, the document defining the limitation shall be referenced in the concession itself (box 20) and the C-OL procedure MD S000N0433E01 could be considered.

The assessment is related to the Nonconformity/ies on the product to be delivered (after repair if any), while taking into consideration any concessions already affecting the part.

The assessment includes the confirmation of Classification.

This assessment shall be recorded on the concession form.

5.4.2 Classification of nonconformities

Nonconformities which affect the following characteristics are classified as "Major":

- Airworthiness,
- Reliability,
- Maintainability,
- Interchangeability,
- Service/storage life,
- Performance/function (including Health/Environment when factor requested by design),
- Cost.

Those above criteria are detailed in the concession template box 23 (see Annex 3) and Annex 4.

Nonconformities that do not affect the above characteristics are "Minor".

5.4.3 Classification of concessions

Concession classification (Minor/Major, Recordable, Not Recordable) is performed by SDRC Design office.

Minor/Major classification will be done after impact assessment (box 23).

Depending upon the nonconformity classification and/or impact, concessions are “Recordable” or “Non Recordable”.

Following nonconformities lead to Recordable concessions:

- nonconformities classified as Major,
- nonconformities classified as Minor that need to be brought to the end-user’s knowledge although they do not give rise to any Limitations imposed on the deliverable Item or Helicopter (e.g. visual nonconformity that can lead to aircrew, ground crew, or maintenance personnel concern).

Other nonconformities lead to Non Recordable concessions.

Note 1: nonconformities that do not need to be known outside the originating SMRC may be documented and managed following PC Internal Procedures (The anomaly procedure when the SMRC is not the SDRC), without the necessity to duplicate the information on the NHI concession format and when these procedures are acceptable to the Customer representative, for example:

- an appearance nonconformity (an appearance nonconformity is confined to a nonconformity that will never give concern to aircrew, ground crew, or maintenance personnel)
- a minor nonconformity which do not lead to any deviation to the Interface specification.

Note 2: nonconformities need to be known outside the originating SMRC in the following cases:

- SMRC is different from SDRC
- Recordable concession
- Not Recordable concessions when necessary for parts/shipsets receiving PCs/FAL e.g. when the effect of the Nonconformity will not be apparent after the next assembly step.

Note 3: When GQA is applicable, the SDR will give full transparency of CO’s to the local NQAR upon request. Also, the FAL NQAR has full access to non-recordable concessions available at FAL-PC.

Note 4: In accordance with applicable GQA, the NQAR of the SDRC may assess the Recordable/Non Recordable classification. If the NQAR of the SDRC does not agree with the classification, he may submit a request for a reclassification.

5.4.4 Interface Design Office Agreement

When a nonconformity has an effect on the other side of an interface, the SDRC design office for the item shall involve the design office of the interface responsible SDRC. The design office of the interface responsible SDRC shall technically assess the concession before agreeing or rejecting the concession.

The agreement of the interface design office shall be indicated, referenced or attached to the concession.

5.4.5 Design Office Acceptance

The final acceptance of the design office shall only be given by SDRC authorised signatories.

5.4.6 Airworthiness Assessment/Authorization

The assessment and signature of the concession by the authorized Airworthiness signatory will confirm that, regarding airworthiness:

- The airworthiness is not impacted, then "Impact on Airworthiness regulations" (box 23) is ticked NO;
or
- In case airworthiness is impacted, appropriate actions (protective measures) have been defined in order to restore the Airworthiness of the HC (such as limitations, inspections).
Document defining impact on airworthiness and/or the protective measures related to a concession shall be clearly mentioned on the concession form (through box 20). "Impact on Airworthiness regulations" box (box 23) must be ticked and the concession is classified "Major". Impact on airworthiness is given against the nonconformity of the part as to be delivered to the customer.
or
- If the nonconformity is not acceptable it shall be explicitly specified on the concession form and shall not be presented to Customer for acceptance.

SDRC airworthiness signature (box 24) states that in respect to the required repair and the residual part status as described in Box 12 and instructions given in Engineering Advice (box 20) that the documentation and decisions are according to applicable airworthiness regulations.

5.5 Repair Attestation

Repair attestation is the confirmation by Quality authorized staff **that**:

- the nonconforming Part has been repaired in accordance with SDRC Repair definition being described in box 12 (including referenced attachments, when applicable),
- the Part's condition, after repair, is compliant with the description in box 12 (including referenced attachments, when applicable),
- the Concession number has been marked per SDRC Engineering instructions, as indicated in box 20.

5.6 Quality acceptance of concessions and release of product

5.6.1 Acceptance

The SDRC quality organisation assesses the overall acceptability of the concession particularly taking into account to:

- Accuracy, completeness, and legibility of information, to provide Customer representative / end user with the appropriate inputs for decision and taking into consideration
- Compliance to the concession process
- No incompatibility between the information recorded in the concession and its category

Quality is entitled to request reclassification of the concessions considering the Classification criteria.

If the data is erroneous, incomplete or missing, the SDRC Quality organisation shall not accept the concession until necessary corrections have been made by the relevant department (within the limit of its responsibilities).

Quality acceptance shall only be given by an authorised signatory when the concession has been accepted by the Design Office and Airworthiness of the SDRC and after repair attestation when applicable.

Nota:

Depending on Partner Company internal rules and agreements with Customer/Purchaser representative the SDRC Quality acceptance of concessions may take place either before or after the disposition has been performed (e. g. repair solution).

5.7 Marking of Items

Each Partner Company shall take appropriate provisions to guarantee the traceability of the concession to the item to be delivered.

A part with a nonconformity covered by a recordable concession shall be marked permanently with the concession sequence number, *without the concession issue. In case the part is also marked with the concession issue, when an update of a concession is needed, the marking of issue shall be stricken through (when feasible).*

For non-recordable concessions, PCs internal procedures apply.

When the part is marked with the concession sequence number, the marking shall be visible at least until the assembly of the part into the next higher assembly.

If this is not possible, each Partner Company shall take appropriate provisions to guarantee the traceability of the concession (marking at the next higher assembly is allowed).

The possibility to reduce the number of non-significant digits is admitted.

Method and location of part marking shall be:

- In accordance with the drawing requirements for identification of the item, or
- according to a defined rule,

and shall be documented on the NHI concession form.

5.8 Modification of Concessions

5.8.1 Modifications

After *the SDRC Quality signature*, any modification to a concession shall lead to a complete raising (same number, new issue), may lead to a new classification and shall require application of the complete concession approval procedure.

Note:

Administrative corrections are allowed without issue update when authorised by means of a SDRC Quality stamp and, if applicable, SDRC NQAR stamp. This is applicable for concessions only existing in paper format.

If a subsequent concession has to be issued for partial serial number already mentioned in a previous concession, the subsequent concession shall refer to the previous one. Only the subsequent concession number shall be marked on the part, all applicable concessions will be included in the delivery documentation.

If needed, for traceability purpose, the previous superseded issue shall be annexed to the new one.

5.8.2 Short Signature Loop

For changes in the concession documentation which do not impact the technical part status nor have influence on the technical release of the part by design, stress and airworthiness, the Short Signature Loop may be processed. *In case the Short Signature Loop is not possible, after SDRC Q decision, a complete raising has to be performed.*

The Short Signature Loop may be processed, when agreed by SDRCQ, on electronic as on paper concessions. On paper concessions, the modified field entries are stroked through and the attestation entries (minimum [date] and [signature]) are renewed aside, as defined for the electronic document in the tables below.

The change by short signature loop is documented at each change on the first page while the Issue stays frozen for the annexes:

Field ID	Field Name	Modification according Short Signature Loop Rules
4	Issue	A Short Signature change Index “-1” is added behind the frozen Issue at the modified 1 st Page only (e.g. B-1). The frozen Concession Annex stays valid without Index added (e.g. B).
12	Non-conformance description	The reason for the short signature loop is added being either (SL=Short Signature Loop): SL PART REALLOCATION SL RECORDABLE CHANGE SL CORRECTIVE ACTION SL VCI MODIFICATION

This is applicable for:

A. SL PART REALLOCATION from one Helicopter to another under condition:

- In the frame of the Part Number applicability to the other H/C (PN is element of TCC /MTC of the target H/C)
- “Loss of on-aircraft maintenance interchangeability” is “NO”
- No operational limitation (CO-L) is on this concession

Processing: By decision of the short signature loop, the following fields are unfrozen and shall be modified:

Field ID	Field Name	Modification according Short Signature Loop Rules
9	Batch N° (H/C allocation)	
15	Originator's Quality	Modification of Field 9, H/C allocation and attestation
26	SDRC Quality	Attesting Short Signature process requirements conformity
27	Customer Representative	Attesting customer approval (if applicable ref: §6)
4	Issue	“-1” Short Signature change Index is added

B. SL RECORDABLE classification change for minor concessions under condition:

- On SDRCQ or customer request

Processing: By decision of the short signature loop, the following fields are unfrozen and shall be modified:

Field ID	Field Name	Modification according Short Signature Loop Rules
	Recordability (YES/NO)	
15	Originator's Quality	Modification of Recordability (YES/NO)
26	SDRC Quality	Attesting Short Signature process requirements conformity
27	Customer Representative	Attesting customer approval (if applicable ref: §6)

C. SL CORRECTIVE ACTION modification

- The modification may be performed under condition that the involvement of Engineering representatives is not mandatory. This Decision is taken by SDRCQ.

Processing: By decision of the short signature loop, the following fields are unfrozen and shall be modified:

Field ID	Field Name	Modification according Short Signature Loop Rules
16	Corrective Action	
15	Originator's Quality	Modification of Field 16 Corrective Action to prevent...
26	SDRC Quality	Attesting Short Signature process requirements conformity
27	Customer Representative	Attesting customer approval (if applicable ref: §6)

D. SL VCI modification

- The VCI modification may be performed when the VCI is evolving, under condition that the PN is included in the changed VCI. Involvement of Engineering representatives is not mandatory. This Decision is taken by SDRCQ.

Processing: By decision of the short signature loop, the following fields are unfrozen and shall be modified:

Field ID	Field Name	Modification according Short Signature Loop Rules
7	CI-Number	Modification of CI number
15	Originator's Quality	Attesting new CI number which includes the PN
26	SDRC Quality	Attesting Short Signature process requirements conformity

5.9 Cancellation of Concessions

If the Product conformity is completely restored with regard to all nonconformities described on the concessions, the concession shall be cancelled by the entity that has restored the product conformity before delivery.

After delivery, when the Product conformity is completely restored with regard to all nonconformities described on the concessions by means of a corrective action (e.g. implementation of ECP) and when requested by the Customer, Industry will take proper provisions to inform the Customer of the release of corresponding corrective action (Managing conformity/concessions status of delivered helicopter remains at Customer's).

For cancellation of a concession, at least first page of the concession to be cancelled shall be at least strikethrough by Quality Department with the indication "Cancelled" by, department, date of cancellation and reason for cancellation.

In case the cancelled concession (recordable) is also reported on a Log Card, the reference number of such concession shall be cancelled also in the Log Card, stricken through with a single line ensuring that it remains readable and attested by authorized staff (date & stamp).

Cancellation of concessions is not to be considered as a modification, raising the issue is not mandatory.

In case the part has been marked, when the concession is cancelled, the marking on the part has to be strikethrough when practical. The number of a cancelled concession shall not be reused under any circumstance.

Before the declaration of cancellation, following checks have to be performed:

- check that the nonconformity has been removed,
- check that the related limitation, if any, has been cancelled.

The cancelled concession shall be distributed according chapter 7 concession distribution (see below).

5.10 Concession procedure for Suppliers at all levels

The present procedure is applicable, except as otherwise agreed.

Each Supplier may use his own detailed internal concession procedure providing it complies with the requirements of the present procedure. This internal procedure shall be described in the Supplier Quality Assurance plan.

The Supplier has to:

- obtain the concession number from the Buyer,
- fill in the concession form in English language (without classification),
- get all necessary acceptance by Customer Representative (if required) (*),
- send the original to the Buyer.

(*) Note: Concession concerning a supplier under GQA shall be presented to local NQAR for signature in box 17 (NQAR beside the supplier).

Due to the nonconformity, any limitation imposed on the Deliverable Item or the Helicopter should be clearly mentioned on the concession form sheet.

After decision and signature by the Buyer, the concession will be returned to the Supplier.

No equipment/Item shall be delivered with a concession if this concession ("Recordable" or "Non Recordable") has not been previously accepted (fully signed by Industry) by the System Design Responsible Company, whatever the classification is.

5.11 Deviation Permit specificities

A Deviation Permit is required when it is known before production starts that a nonconformity will occur.

A Deviation Permit shall relate to the lowest of assembly or item facing nonconformity.

Deviation permits should be initiated on request of the Production Organization only after consultation of the SDRC Engineering, and shall be supported by a committed corrective action plan to eliminate the cause of the nonconformity (approved change request, approved improvement plan, etc.).

For Deviation Permits classified as "Minor", a single Deviation Permit may be issued to cover all items that are subjected to the same nonconformity. In case of a Major classification or re-classification to Major, one Deviation Permit per single part has to be issued.

6 INVOLVEMENT OF CUSTOMER REPRESENTATIVE

Once the request for a concession has been accepted by Quality Department of the System Design Responsible, Recordable concession referring to major nonconformity shall be submitted to the SDRC Customer representative who will notify by his signature/stamp the Official acceptance (or refusal). The full responsibility of the product/component stays at the IND.

Recordable concession referring to minor nonconformity shall be presented to the SDRC Customer representative for acceptance (or refusal only in case of established erroneous classification of the nonconformity having led to this concession). If, for concessions managed by NAHEMA, the NH026 "exceptional" rule is applied in order to assess a minor recordable concession within the NAHEMA loop, "MLN" (Major Loop NAHEMA) will be filled in box 27 of the concession form.

If the Customer representative is not able to decide on behalf of the Customer, then the Recordable concession has to be presented to the Customer. In such a case, distribution of the necessary file to the Customer should be facilitated by the SDRC, at the Customer representative request.

Major Nonconformities related to a Type Design will be submitted to the appropriate Authority by Customer representative who may record the Reference of Authority approval before its own Visa.

During this decisional process, Industry can decide to continue their industrial process, at their own risk including transfer between companies. However, it is recommended to consult local NQAR and to agree on a roadmap for an open concession before the decision will be made to go-on with industrial process (national regulations prevail). If a concession is not accepted, Industry will address Customer's reasons for rejection and take appropriate action to solve the issue.

All use with repair and use as is dispositions must be acceptable to the Customer representative/NQAR (for recordable and non-recordable concessions).

The Customer representative has the right to examine all concessions.

Nota:

Any concession with impact on Airworthiness can only be submitted for Customer approval under the condition that associated protective measures when relevant (e.g. limitation) have been released

During the Customer Acceptance phase, and unless otherwise agreed with Customer, concession issued or updated will be submitted to the SDRC NQAR for Acceptance.

7 CONCESSIONS DISTRIBUTION

Once finally accepted, the concession shall be distributed:

- inside the SDRC:
 - ✓ according to in house procedure,
 - ✓ to Customer representative.
- outside the SDRC:
 - ✓ Concessions and Deviation Permits are distributed between PCs, as part of Delivery Data Package, in accordance with the Shipment & Handover procedure. Dedicated Focal Points are nominated for the management of concessions between PCs applying available tools, such as NHI concession cockpit and SAP (used by AH, AHD).

All following evolutions shall be known by the relevant Final Assembly Line:

- Non Recordable concession becoming Recordable
- Recordable concession becoming Non Recordable
- A new issue of a Recordable concession
- Cancellation of Recordable concession
- Non-Recordable affecting the Final Assembly Line.

Concessions subjected to evolution shall be at least distributed as the previous one

8 ELECTRONIC SIGNATURE: E-CONCESSION TOOL

The use of electronic concessions ("e-concession") associated to electronic signatures (including NQAR approval process) is allowed through e-concession tool.

Note:

- The concession process mentioned in this document is not modified,
- The printout concession format is not changed.

In this case, the written signature could be replaced by the word "SIGNED" under the name of the signatory, the department and approval date or the scanned signature as far as info is completely secured by the system for the related box of the form (pass word needed and cross check by the system of declared authorized people).



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ANNEX 1

Model concession form (first page)

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Number **QD S000N0805E01**

Issue **P**

Date **10/02/2021**

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Programme: <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">0</div>	CONCESSION/ <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">1</div> DEVIATION PERMIT	SDRC <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">2</div>	Number CO <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">3</div> DP	Issue <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">4</div>	Page <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">5</div>				
		* Non-conformity Major / Minor		* RECORDABLE Yes / No					
Originator's company <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">6</div> Plant Department	CI number:..... Part number Description <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">7</div> Drawing number Serial number	Quantity: <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">8</div> Batch N°: <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">9</div> Anomaly Report/Concession ref: <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">13</div>	* SAFETY CLASS <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">11</div> <table border="1" style="width:100%; border-collapse: collapse; margin-top: 5px;"> <tr> <td style="width:50%; text-align: center;">1a</td> <td style="width:50%; text-align: center;">1b</td> </tr> <tr> <td style="text-align: center;">2</td> <td style="text-align: center;">3</td> </tr> </table> Work order N° <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">10</div>			1a	1b	2	3
1a	1b								
2	3								
Non-conformance description: <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">12</div> Cause of the non-conformity:		Originator Name:..... Dept.: Date:..... Signature: <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">14</div>							
Corrective action to prevent non-conformance recurrence: <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">16</div>		Originator's Quality Reviewed:..... Name:..... Dept.:..... Date:..... Signature: <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">15</div>							
Equipment supplier's Engineering advice: <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">18</div>		Equipment Supplier Engineering Name:..... Date:..... Signature: <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">19</div>							
SDRC Engineering advice: <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">20</div> Choice decision: * Use as is * Use with Repair Marking method and location: B: Reliab. C: Maintain. D: Interchang. E: Service/storage life F: Perfo./funct. G: Cost		SDRC Stress Responsible Name:..... Dept.:..... Date Signature: <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">21</div>							
* Impact on airworthiness regulations Yes No * Reliability Yes No		Partner Company repairing attestation							
* Impact on contractual performances Yes No * Reduced "life limits" <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">23</div> Yes No		Decision:.....							
* Loss of on-aircraft maintenance interch. Yes No * Reduced "Time between Overhaul" Yes No		Dept.:.....							
* Reduced future repair capability Yes No * Need of additional spares Yes No		Name							
* Additional or special maintenance Yes No * Need of special spares Yes No		Date Signature:..... Stamp:..... <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">25</div>							
SDRC airworthiness		SDRC Quality		Customer Representative					
Decision:..... Name:..... Dept.:..... Date:..... Signature: <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">24</div>		Decision:..... Name:..... Dept.:..... Date:..... Signature: <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">26</div>		Decision:..... Name:..... Dept.:..... Date:..... Signature: <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">27</div>					
DISTRIBUTION <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">28</div>		Configuration management <div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 5px auto;">29</div>							



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ANNEX 2

Model concession form (second page)

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Programme:

.....

**CONCESSION/
DEVIATION PERMIT**

CO/DP

Page: /

Quality Confirmation

Name

Date

Visa

ANNEX 3
Procedure to fill in CONCESSION Form

The block numbering is to be considered as the document signature sequence.

Block No.	Content	Responsible
0	Programme reference	Originator (entity who identified the Non Conformity)
1	Classification of non-conformity/concession/deviation permit: proposal, (not mandatory)	Originator
2	System Design Responsible Company	Originator
3	Cross out the useless abbreviation (CO or DP) and enter the number of concession/ deviation permit	Originator
4	Issue	Originator
5	Page numbering	Originator
6	Originators company, plant and department	Originator
7	CI number (not mandatory) or Programme Part number, Supplier Part Number description, drawing number and serial number of non-conform Item	Originator
8	Quantity of non-conforming Items	Originator
9	Batch number (if no serial number in block 7) and/or HC identification (e.g. TGEA0xx)	Originator
10	Work order of affected Item	Originator
11	Safety Class of non-conforming mechanical & structural part	Originator
12	Description and cause of nonconformity <ul style="list-style-type: none"> Brief description of the initial nonconformity; Brief description and, when needed, reference to required repair; Brief description of residual nonconformity as it shall be delivered to the customer in comparison towards the approved design 	Originator
13	Anomaly Report reference (traceability). Note: side CO reference (e.g. from SAP) can be quoted.	Originator
14	Originator data and signature	Originator
15	Quality Management data and signature (only if block 14 is filled)	Originator-QM
16	Corrective action defined or foreseen and responsible	Originator-QM
17	Completed with the words "not applicable" unless Local NQAR has requested to sign for all concessions (not case by case). NQAR data and signature (on request and according to GQA rules).	Originator / NQAR of Originator
18	Equipment Supplier's engineering advice (when applicable)	Originator Engineering
19	Equipment Supplier's engineering data and signature (when applicable)	Originator Engineering
20	SDRC Engineering advice Circle the identified criteria for non-conformity (refer Annex 4) Add other indications when useful/necessary.	Design (Authorized staff)
21	SDRC Stress decision, data and signature (if relevant)	Stress
22	SDRC authorised Engineering signatory decision (including confirmation of concession/ deviation permit classification, data and signature; including limitation & reference) (when applicable)	Design (Authorized staff)
23	Impact on the deliverable Item or H/C (refer to Annex 4) The impact blocks (yes or not) must be filled in all cases, always filled before block 25 and congruent with concession classification (minor/Major)	Design

24	SDRC Airworthiness signature	Airworthiness
25	Partner Company/Supplier verification and attestation (When Engineering advice is "Use as is", "not applicable" will be mentioned in the box)	Quality (Authorized staff)
26	SDRC Quality Management decision (including concession/deviation permit final classification)	Quality
27	NQAR/Authority decision (or Customer representative decision)	NQAR of SDRC or authorized Customer representative
28	Distribution	Distributor
29	Configuration Management	Box no longer used

ANNEX 4

Correlation between concession classification criteria and CO/DP characteristics

Based on information given through Concession/Deviation Permit box 23, following impacts may be applicable and will lead to CO/DP Major classification:

1. an impact on conditions specified by the applicable Airworthiness regulations,
2. an impact on contractual performances (including operation of the equipment itself),
3. a loss of on-aircraft maintenance interchangeability,
4. significantly reduced future repair capability, this means a reduction of autonomous repairs by the end user,
5. additional or special maintenance requirements (i.e. inspections, instructions or planning),
6. a significant impact on reliability,
7. reduced "life limits",
8. Reduced "time between overhaul" (TBO),
9. the need of additional spares,
10. the need of special spares.

In order to relate above criteria with the following characteristics:

- A/** Airworthiness;
B/ Reliability;
C/ Maintainability;
D/ Interchangeability;
E/ Service/storage life;
F/ Performance/function;
G/ Cost;

Below Matrix is defined to provide guidance for an appropriate correlation between points 1 to 10 and points A to G:

Impact Characteristics	Impact Descriptions									
	1	2	3	4	5	6	7	8	9	10
Airworthiness	X ^(*)									
Reliability	X	X			X	X	X	X	X	X
Maintainability		X		X	X		X	X	X	X
Interchangeability		X	<u>X</u>		X				X	X
Service/storage life		X		X	X	X	X	X	X	X
Performance/function	X	X	<u>X</u>			X	X	X		
Cost		X	<u>X</u>	X	X	X	X	X	X	X

The **B** to **G** characteristics will be referenced in the DP/CO block 20 (see note).

Example (X): Loss on aircraft maintenance interchangeability: Impact description 3 is expected to have potential impact on the characteristics: Interchangeability, Performance/function and Cost.

(*) Note: Characteristics **A** is not reported through CO/DP template because covered by Airworthiness assessment in box 23 and 25.