DHF Impact and Actions Recommendation – EN 9116:2025

Gap Assessment: EN 9116:2025 versus EN 9116:2015

Document Type: Design History File (DHF) Impact Analysis

Standard Reference: EN 9116:2025 – Aerospace series – Notice of change (NOC)

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1. Executive Summary

EN 9116:2025 preserves the basic technical intent of the 2015 edition for notice of change, change impact analysis, delegated authority, and customer oversight, but it consistently raises the control level through stronger baseline-definition expectations, tighter contractual alignment, broader documented-information obligations, and clearer delegation rules. The attached gap assessment identifies the principal DHF impacts as stronger baseline traceability, explicit linkage of change classification to customer contract terms and DAH requirements, broader CIA/NOC coverage, EN 9100:2018-aligned QMS evidence, stronger customer-agreement documentation, and more rigorous retained information for delegated authority and customer oversight.

Key Impact Areas for DHF:

- Baseline configuration definition and evidence linkage.
- Contract-driven change classification and customer-approval triggers.
- FAI and partial FAI linkage to change-control decisions.
- Broader CIA/NOC traceability, including concurrent-notification changes.
- Stronger documented-information control aligned to EN 9100:2018.
- Expanded evidence for customer agreements, delegated authority, competencies, and sub-tier control.

This document converts the attached EN 9116:2025 versus 2015 comparison into a DHF impact-and-actions recommendation using the same structured implementation style reflected in the attached DHF reference document.

2. Key Changes Summary

2.1 Baseline configuration definition and DHF traceability

Change: The 2025 edition strengthens the baseline-configuration concept by emphasizing acceptance conditions, compliance evidence, and complete customer-requirement coverage, rather than only describing the agreed product definition. The comparison states that the practical impact is a higher expectation that the DHF clearly show the accepted baseline and the effect of any baseline change on drawings, bills of material, manufacturing methods, and system or functional parameters.

DHF Impact:

- DHF baseline sections should explicitly identify the accepted configuration and the evidence supporting its approval status.
- Verification, validation, and configuration records should be traceable back to the customer-accepted baseline, not just to internal revision history.
- Baseline-change assessments should show downstream impacts on design data, BOMs, methods, and applicable certification/compliance evidence.

Recommended Actions:

Action	Timeline	Owner	Priority
Update DHF baseline section to identify accepted baseline, approval status, and supporting evidence	3 weeks	Configuration Management / Quality	Critical
Link baseline configuration to drawings, BOMs, manufacturing methods, and V&V records in the traceability matrix	4 weeks	Design Engineering / Quality	High
Add baseline-change rationale template showing impact on system/function/compliance evidence	4 weeks	Configuration Management	High

2.2 Change-type classification tied more directly to contract terms

Change: EN 9116:2025 ties change-type control more directly to customer contract terms and conditions, while still preserving the role of customer or design approval holder oversight. The gap assessment notes that the practical effect is that change triggers and thresholds should be checked against both contract requirements and DAH expectations.

DHF Impact:

- Change-classification procedures should reference contract-specific criteria, not only general engineering judgment or legacy customer practice.
- DHF change-control records must be able to show how a change type was classified against the applicable contract and DAH framework.
- Threshold-based changes should include objective rationale for whether they are configuration, non-configuration, prior-approval, or concurrent-notification events.

Recommended Actions:

Action	Timeline	Owner	Priority
Update change-classification SOP to reference contract terms and DAH requirements explicitly	3 weeks	Quality Systems / Contracts	Critical
Add contract-reference field to DHF change assessment and CIA templates	2 weeks	Documentation Control	High
Review current change thresholds for alignment with active customer contracts	5 weeks	Program Management / Quality	High

2.3 Customer approval triggers and FAI linkage

Change: Critical customer-acceptance triggers remain substantively unchanged, including airworthiness, safety, function, tolerances, software identity, frozen designs, and other critical design-data changes. However, the 2025 edition adds explicit reference to changes that trigger FAI or partial FAI under EN 9102 as events that may require prior customer acceptance.

DHF Impact:

- Change-control records should explicitly document whether a change triggers full or partial FAI and whether that trigger requires customer approval.
- Design-transfer, manufacturing-change, and configuration-change workflows should be cross-linked so FAI consequences are not assessed separately from the DHF change decision.
- Existing approval triggers may remain technically valid, but templates and reviewer checklists need revision to include FAI logic.

Recommended Actions:

Action	Timeline	Owner	Priority

Add FAI/partial FAI assessment field to CIA and change-control forms	2 weeks	Quality Documentation	High
Update reviewer checklist to confirm customer-approval linkage when FAI is triggered	3 weeks	Quality Assurance	High
Cross-reference DHF change assessments to EN 9102 design-transfer and manufacturing records	4 weeks	Manufacturing Engineering / Quality	Medium

2.4 CIA and NOC scope expands to concurrent-notification changes

Change: The 2025 edition broadens CIA/NOC requirements so they also cover changes implemented concurrent with notification, not only those requiring prior approval. The gap assessment highlights stronger linkage between change classification, impact assessment, customer notification, and retained evidence of delegated authorization.

DHF Impact:

- More changes will need documented CIA and NOC traceability in the DHF, even when prior customer approval is not required.
- Delegated-authority evidence must be easy to retrieve whenever concurrent-notification pathways are used.
- Internal workflows should prevent any concurrent-implementation decision from bypassing documented impact analysis.

Recommended Actions:

Action	Timeline	Owner	Priority
Revise CIA/NOC procedure to include concurrent-notification changes explicitly	3 weeks	Quality Systems	Critical
Add delegated-authority verification step before concurrent implementation is released	3 weeks	Configuration Control Board	High
Audit recent concurrent changes to confirm CIA/NOC evidence exists and is traceable	5 weeks	Internal Audit / QA	High

2.5 QMS and documented-information control aligned to EN 9100:2018

Change: EN 9116:2025 maps quality-management expectations more explicitly to EN 9100:2018 clauses and replaces the older general record-retention emphasis with stronger documented-information control