


FOREWORD

This Guidance Material (GM) provides information to air operators, maintenance management organisations, aircraft maintenance organisations and distributors on existing requirements for approved parts and the handling of Suspected Unapproved Parts (SUPs). Guidance is also given on how the detection of SUPs should be reported to the CAAB.

This GM applies to operators of Bangladesh registered aircraft, all ANO Part M Subpart F Maintenance Management Organisations, ANO Part 145 Aircraft Maintenance Organisations (AMO) and all suppliers referred to ANO Part 21, Subpart K and ANO B.14.

This GM is effective on the day of publication on the CAAB website.



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Guidance Material on Suspected Unapproved Parts

1. Introduction

- 1.1 CAAB is concerned about the possible installation of unapproved parts inadvertently on Bangladesh registered aircraft. The installation of unapproved parts on aircraft has serious airworthiness implications.
- 1.2 Unapproved parts include counterfeit parts with falsified release documentation. Genuine approved parts are manufactured and tested to airworthiness standards by qualified personnel, and are hence likely to be costlier than similar parts meant for non-aviation applications. This difference in cost has resulted in cases of unapproved parts with falsified release documentation being passed off as genuine approved parts. The following two internationally reported similar cases have been known to the CAAB:
 - (a) A helicopter main rotor blade complete with release documentation was traced as having been scrapped by the manufacturer during the manufacturing process; and
 - (b) An engine mount described as fitted new to an aircraft in 1979 was traced as having been factory installed in 1966.

2. APPROVED PARTS.

- 2.1 Approved parts are parts normally accompanied by airworthiness release certificate acceptable to the CAAB as prescribed in ANO Part 21, Subpart K, and ANO B.14.

3. Unapproved Parts.

- 3.1 Parts that do not conform to the conditions listed above under section 2 are unapproved parts and cannot be installed onto Bangladesh registered aircraft.
- 3.2 Unapproved parts also include, but are not limited to;
 - (a) Parts that have been intentionally misrepresented, including counterfeit parts that are accompanied by falsified release documentation.
 - (b) New parts that were manufactured in accordance with approved data and procedures by an approved manufacturer but did not pass through an approved quality system and is not accompanied by proper documentation, e.g. production overruns.
 - (c) New parts that were manufactured in Accordance with approved data and procedures by an approved manufacturer, and passed through an approved quality system but do not conform to the approved design/data, e.g. defective parts that were missed during the manufacturer's quality checks.
 - (d) Used parts that were not maintained in accordance with approved airworthiness data and procedures, or were maintained by unauthorised persons.

4. Responsibility of The Installer of the Part

- 3.1 To determine that the installation of a part complies with the applicable regulations, the installer of the part is ultimately responsible for establishing that the part conforms to its type design and is in a condition for safe operation ("airworthy").

5. Precautions to Prevent the Inadvertent Acceptance of Unapproved Parts

- 5.1 Documentary evidence of compliance with an approved process will not in itself provide a guarantee against the installation of unapproved parts if the original supplier of such parts knowingly provides false information or otherwise sets out to deceive.
- 5.2 It is always necessary to have secondary defences in place designed to give early warning of unapproved parts prior to their release for installation. The primary defence in such cases is a strong, well-informed and alert parts ordering and receiving system which, through auditing and reports, establishes a satisfactory level of confidence in its parts suppliers and which:
- (a) Ensures a continual correlation between parts ordered and parts received;
 - (b) Is alert to any unauthorized alterations to supporting documentation and to any inability of the supplier to supply the required documentation;
 - (c) Is aware if a quoted price for the part is significantly lower than that quoted by other suppliers;
 - (d) Is aware that delivery times are significantly shorter than those quoted by other suppliers; **and**
 - (e) Is aware of parts packaging methods used by approved parts manufacturers, maintenance organizations and distributors, and can detect deviations from these methods.
- 5.3 Organizations, particularly approved maintenance organizations and operators, should ensure that all those staff who have routine contact with parts, including especially buyers, stores staff, mechanics and certifying staff, are fully aware of the dangers posed by unapproved parts and also the likely sources. Ample warnings should be given to such staff about accessing any unapproved parts database. Approved maintenance organizations and operators will also need to ensure that their parts suppliers are fully integrated into the reporting network, and audits will be necessary among staff at intervals to ensure that all remain vigilant to the problem.

6. Unapproved Parts Reporting

- 6.1 Systems used by end users to report to Type Certificate holders and regulatory agencies are intended to provide widespread warning of the detection of unapproved parts so that operators of similar equipment can be made aware as soon as possible. In view of the likely random appearance of unapproved parts, access to a reporting system should be easy and available at all reasonable times. It follows that publicity for the reporting system (and the programmes generally) should be widespread.
- 6.2 In order to obtain as much information as possible from a report of a suspected unapproved part, it is necessary to have a standardized reporting format. Information required will include part description and from where received; part and (if applicable) serial numbers; particular colours, markings, dimensions and features common to the unapproved part which distinguish it from the genuine item; and the nature of any accompanying documentation.
- 6.3 At any time a part is deemed to be suspect, it and any accompanying documentation should be quarantined immediately and held until the body responsible for processing the reports is

satisfied that the evidence is no longer required or until the authenticity of the part has been established.

- 5.4 Some reports of suspected unapproved parts will eventually turn out to be false as further information becomes available in the form of supporting documentation, etc. A successful reporting system should accept such false alarms and the wasted effort they generate in the knowledge that to discourage them might eventually lead to the suppression of a genuine report.
- 6.5 A relatively simple database, preferably computer driven, will be required to maintain a record and allow easy processing of reports of suspected unapproved parts. The database should be capable of interrogation such that any common thread within the reports received is readily identified by keyword access. The database itself can be a dedicated system or part of a much larger general occurrence reporting system.
- 6.6 In view of the international nature of the aviation industry and in particular the known international nature of the generation and distribution of unapproved parts, the ability to link national databases is obviously advantageous, the unimpeded cross-flow of information being essential in successfully combating the problem.
- 6.7 It is recognized that parts stockists and distributors have a significant influence over preventing the use of unapproved parts. Such organizations have an established commercial role of stocking or obtaining parts, often at short notice. Some States approve stockists and distributors but others do not.

7. Action by Air Operators, AMOs and Distributors.

- 6.1 CAAB stresses that distributors must be vigilant to ensure that parts supplied to users are thoroughly checked and are approved parts. MMOs and AMOs must also be vigilant in their receiving inspections to ensure that only approved parts are inducted into their stores. Users must check all parts received, whether new or used, to ensure that only approved parts are accepted.
- 7.2 Any parts that, for any reason, are suspected to be unapproved, should be quarantined and properly disposed of once investigations conclude that they are unapproved parts. Reasons for suspecting a part to be unapproved may include findings such as different finish, size, colour, improper (or lack of) identification, incomplete or altered release documents, or any other questionable indication. These cases should be immediately reported to QCAA, the Type Certificate Holder, and if applicable, the operator.

8. Reporting.

- 8.1 In the event that a suspected unapproved part is identified, the person, maintenance organisation, distributor or operator detecting it should make a report using a Form in Appendix 1 and furnish the required information.
- 8.2 Block 12 of Appendix 1 does not have to be completed if the reporter is not willing to provide that information.

SUSPECTED UNAPPROVED PARTS REPORT		
Refer to page 2 for instructions on how to complete this form.		
1. Date the part was discovered:		2. Part Name:
3. Part Number:		4. Part Serial Number:
5. Quantity:	6. Assembly Name: Assembly Number:	7. Aircraft Make & Model:
8. Name, address and description of the company or person who supplied or repaired the part:		
Name:		Street Address:
City:	State:	Postal Code:
9. Description of the Issue:		
10. Name and address of (the Company or Person) where the part was discovered:		
Name:		Street Address:
City:	State:	Postal Code:
Country:		Phone Number:
11. Date of this report:		
12. Name and address of the reporter:		
Name:		Street Address:
City:	State:	Postal Code:
Country:		Phone Number:
13. <input type="checkbox"/> Check this box if you have attached additional information.		

Instructions for Completing QCAA AW/SUPR 01, Suspected Unapproved Parts Report

1. Record the date the part was discovered.
2. Record the part name (or description of the part).
3. Record the part number or identification number of the part.
4. Record the serial number on the part, if applicable.
5. Record the quantity of the parts.
6. Record the assembly name and the assembly number (where the part was or could be installed).

Example:

1. Date the part was discovered:		2. Part Name: Strut
3. Part Number: PN 12345		4. Part Serial Number: 6789
5. Quantity: 1	6. Assembly Name: Main Landing Gear Assembly Number: PN 90101112	7. Aircraft Make & Model:

Note: Record additional part numbers on page 3 or a blank sheet of paper with the following column headers:

Part Name – Part Number – Serial Number – Quantity – Assembly Name – Assembly Number

7. Record the type of aircraft the part was (or could be) installed on.
8. Record the complete name and address of the company or person who produced, repaired, and/or sold the part. Do not list a P.O. Box address unless a street address is not available.
9. Record a brief narrative stating why you believe the part is not approved. Include a description of the part (improper configuration, suspect marking, different materials, etc.), where it was obtained, and what type of documentation was supplied with it.
10. Record the complete name and address of the location where the part was found.
11. Record the date the report was submitted.
12. Stipulate the name and address of the reporter.
13. Check this box if you have attached additional information.