



AFRA Workshop Discussion

*Accreditation Program & The BMP / Documentation
For Parts Through Disassembly Process*

Speaker: Kelly Lyon, AFRA & ASA Auditor

Speaker: Roy Resto, Aviation Integrated Management
Solutions Consulting, LLC



Speaker: Kelly Lyon, AFRA & ASA Auditor





AFRA Accreditation & BMP Overview

Agenda Topics

- *The Audit Process:*
- *You Firm's BMP Manual*
- *Understanding the BMP*
- *Elements of a successful audit*



The Audit Process

Request Application

Email your request for AFRA BMP Accreditation application to: David Bernstein
An application and additional details will be forwarded to you.

- You will receive the current BMP, and Accreditation Agreement.
The Agreement basically states that once the Agreement is completed and returned, an invoice will be issued of which at least 50% must be paid before audit dates can be discussed

Complete the Checklist

All companies will be required to complete the Audit Checklist (Appendix Two of the BMP) in order to have the application accepted by AFRA. [Merged BMP](#) - Appendix Two: Pages 65-104



The Audit Process, Continued

Schedule Your Audit Once your application has been accepted, AFRA staff will work with your company and the auditor to set up your audit date. The date will vary depending on availability.

Your company is responsible for the auditor's travel fees associated with your audit. However, when audits are scheduled in tandem with other nearby companies, you may be able to share travel fees with other companies being audited.

About Your Audit The AFRA Audit is expected to be 1 day long. However, the auditor may extend it if needed. Unless you are told otherwise, in order to pass the initial audit, the Auditee does not have to be actively involved in a disassembly. However, in order to maintain the accreditation, AFRA will need to observe a disassembly within 13 months of initial accreditation.



Your Firm's BMP Manual

Article II b) BMP System Requirements.

BEST PRACTICE (II)(b) 1 - Each accredited company shall have a BMP Manual.

BEST PRACTICE (II)(b) 2 - The BMP Manual is made up of all of the *Procedures* reflecting the company's compliance with this BMP.

From the Definitions Section: **Procedure means** a written method or practice for accomplishing a task



Your Firm's BMP Manual, Continued

From the Definitions Section: **Procedure means** a written method or practice for accomplishing a task

For a moment, lets consider:

APPENDIX ONE: Best Practice Advisory Guidance

Practice Guides and Minimum Standards

A **Minimum Standard** states the minimum requirement in order to pass the AFRA BMP audit on the first audit. A company that does not meet the minimum standard will not pass the audit.

In the entire APPENDIX ONE, the Minimum Standard sections calls for a '**Procedure**' 45 times

In the entire APPENDIX ONE, the Minimum Standard sections calls for a '**Written Description**' 5 times

Your Firm's BMP Manual, Continued

BEST PRACTICE (II)(b) 3 - This BMP manual may be part of another manual system, and/or it may incorporate and/or commingle issues that are not reflected within this BMP; however the procedures found within the BMP Manual *should include references to the BMP sections that they are each designed to meet*, either in the procedures themselves, in the headings to the procedures, or in an index to the BMP Manual and its procedures.

For simplicity, a matrix showing your procedures cross referenced to the applicable BMP Section would greatly simplify the auditing process. *NOTE: This is one way, but not the only way, to comply with this BMP requirement*



Your Firm's BMP Manual, Continued

BEST PRACTICE (II)(b) 4 - The BMP manual must have a change management tracking system, such as a list of sections affected that tracks the revision history of the BMP Manual.

This is typically met with a section called “RECORD OF REVISIONS” and a “LIST OF EFFECTIVE PAGES” (LOEP)



Your Firm's BMP Manual, Continued

- Resist the temptation to write the manual for 'benefit of the audit.' You should write it for the *benefit of your employees*
- Keep it up to date
- "Say what you do, and do what you say"



Understanding The BMP:

Major Divisions Of The Entire BMP

THE BEST PRACTICES

APPENDIX ONE: Best Practice Advisory Guidance.

APPENDIX TWO: Disassembly Best Practice Auditing Guidance.

APPENDIX THREE: Recycling Best Practice Auditing Guidance

APPENDIX FOUR: Reserved

APPENDIX FIVE: Best Practice Contracting Guidance for Disassembly Facilities

Understanding The BMP, Continued

THE BEST PRACTICES – *Major Sections*

OVERVIEW

- Contains important historical and background info

PART I: PROVISIONS APPLICABLE TO ALL FACILITIES

- Also contains valuable definitions

PART II: PROVISIONS APPLICABLE TO DISASSEMBLY FACILITIES

PART III: PROVISIONS APPLICABLE TO RECYCLING FACILITIES

NOTE THE COLOR CODE

Understanding The BMP, Continued

APPENDIX ONE: Best Practice Advisory Guidance *Practice Guides and Minimum Standards*

The entire Appendix is structured as follows:

• A restatement of a BEST PRACTICE Paragraph

• Practice Guides for that Paragraph

• The Minimum Standards for that Paragraph

Understanding The BMP, Continued

APPENDIX ONE: Best Practice Advisory Guidance *Practice Guides and Minimum Standards*

Important Definitions

Practice Guides reflect advice from AFRA on how to meet the principles established by the Best Practices. Generally, they reflect one way but not necessarily the only way to meet the Best Practice. In some cases they might reflect the only practical manner in which to meet the Best Practice, and in other cases a Facility may employ other approaches that could be judged to meet the Best Practice.

A **Minimum Standard** states the minimum requirement in order to pass the AFRA BMP audit on the first audit. A company that does not meet the minimum standard will not pass the audit. Minimum standards do not take the place of the BMP Best Practice Standards; they are advisory in nature and they are meant to establish minimum levels for companies new to the industry. Companies are expected to evolve their own quality systems beyond the Minimum Standards in order to meet the intent of the BMP Standards. As the industry evolves, AFRA expects that the AFRA BMP Committee will raise the Minimum Standards.

Understanding The BMP, Continued

APPENDIX ONE: Best Practice Advisory Guidance *Practice Guides and Minimum Standards*

Sample Excerpt

Article III d) – Inventory Accounting & Audits

BEST PRACTICE (III)(d) 1 - The Facility shall have a procedure for periodic internal audits to the BMP Checklist.

Practice Guide:

1. Periodic verification of internal practices through auditing controls and procedures helps to assure that internal procedures are followed.

Minimum Standards

Procedure and copies of audit records (preferably using BMP checklist)



Understanding The BMP, Continued

APPENDIX TWO: Disassembly Best Practice Auditing Guidance

Applies ONLY to Disassembly Accreditees

NOTE: It is acceptable to use and cite this Appendix to meet the requirement to have an internal audit procedure

NOTE: The AFRA Auditor *will* use this Appendix to audit your facility



Understanding The BMP, Continued

APPENDIX TWO: Disassembly Best Practice Auditing Guidance

For Auditing efficiency, the Appendix is conveniently divided into these sections:

- Manual
- Facility
- Inventory
- Audit Records
- Tooling Records
- Training Records
- Work Package
- Contract Review



Understanding The BMP, Continued

APPENDIX TWO: Disassembly Best Practice Auditing Guidance

Sample Excerpt

Best Practice Reference	Auditor Task	Procedure/Other References
Manual		
BEST PRACTICE (III)(a) 1 - The Facility shall have a fixed location for disassembly and/or recycling, or a procedure for assuring that the location for disassembly and/or recycling is adequately prepared, or both.	Identify whether there is a fixed location, remote location(s), or both	



Understanding The BMP, Continued

APPENDIX THREE: Recycling Best Practice Auditing Guidance

Applies ONLY to Recycling Accreditees

NOTE: It is acceptable to use and cite this Appendix to meet the requirement to have an internal audit procedure

NOTE: The AFRA Auditor *will* use this Appendix to audit your facility



Understanding The BMP, Continued

APPENDIX THREE: Recycling Best Practice Auditing Guidance

For Auditing efficiency, the Appendix is conveniently divided into these sections:

- Manual
- Facility
- Inventory
- Audit Records
- Tooling Records
- Training Records
- Work Package
- Contract Review
- Shipping



Understanding The BMP, Continued

APPENDIX THREE: Recycling Best Practice Auditing Guidance

Sample Excerpt

Best Practice Reference	Auditor Task	Procedure/Other References
Manual		
BEST PRACTICE (III)(a) 1 - The Facility shall have a fixed location for disassembly and/or recycling, or a procedure for assuring that the location for disassembly and/or recycling is adequately prepared, or both.	Identify whether there is a fixed location, remote location(s), or both	



Understanding The BMP, Continued

APPENDIX FIVE: Best Practice Contracting Guidance for Disassembly Facilities

Applies ONLY to Disassembly Facilities

Contract Element Checklist

The following Appendix represents a list of questions that ought to be considered in preparing a contract between the disassembly facility and the owner of the asset to be disassembled. It is not meant to be complete or all-inclusive. It is only a guide to help stimulate consideration of certain important issues that ought to be addressed.

Understanding The BMP, Continued

APPENDIX FIVE: Best Practice Contracting Guidance for Disassembly Facilities

Except

- What is the asset and what is the scope of work? What exactly does the customer expect?
- Who identifies the need for, and obtains the licenses, associated with the work scope? Which set of laws applies to the disassembly?
- Where does the disassembly take place?
- Who is responsible for access to the site where the aircraft is located and who has access?



Understanding The BMP, Continued

APPENDIX FIVE: Best Practice Contracting Guidance for Disassembly Facilities

It also contains:

A short sample list of specific issues to consider when drafting an agreement reflecting disassembly work to be performed:

- Airfield parking, landing, licenses and fees
- Aircraft function test
- Identification of parts removed
- Certification of parts removed
- Cabin interior (removal of articles)
- Fluid disposal (fuel, hydraulic fluid, venting)
- Packaging and delivery of parts
- Disposal of remainder
- Special handling or disposal of hazardous wastes
- Protection and security of asset/location
- Insurance



Elements of a Successful Audit

TWO AREAS TO ADDRESS: Preparation and Common Audit Findings

Preparation:

- *Have you sent AFRA/Auditor your latest manual?*
- *Have the following compiled and accessible at the beginning of the audit:*
 - *A hard copy of the manual*
 - *Training Records*
 - *Internal Audit Records*

Consider inviting key members of your staff to the in-briefing

Following the in-brief, consider giving the auditor a quick tour for his familiarisation and planning purposes

Elements of a Successful Audit

TWO AREAS TO ADDRESS: Preparation and Common Audit Findings

Common Audit findings:

- *The Quality Manual does not reference the AFRA BMP, including cross references to other procedures*
- *The self audit program does not include a self audit to the AFRA BMP using the AFRA BMP Checklist*
- *Training is not documented*
- *No one is designated to ensure compliance with environmental , health, and safety compliance*

Elements of a Successful Audit

Common Audit findings:

- *The pre-disassembly procedures do not include draining of lavs*
- *The contract with the customer does not specify who is responsible for moving the asset to the disassembly location*
- *The procedures for securing the disassembly site does not address disassembly at a remote site*
- *Parts from disassembled higher assemblies are not identified*
- *Parts are not identified as they are removed from the asset*
- *Procedures for disassembly of an asset are not the same for customer owned assets and assets owned by the disassembly facility*

Elements of a Successful Audit

Common Audit findings:

- *When work that is within the scope of the AFRA Accreditation are contracted to a third party, there is not a written management plan established to ensure compliance with the AFRA BMP by the contracted company. This would also include a periodic audit of the contracted company using the BMP Checklist*
- *There is no procedure for ensuring compliance to applicable import and export regulations*
- *There is no clear written understanding of who owns the asset after the disassembly is completed*



BMP Development Committee – Revisions to BMP

- Recommendation to the Board for consideration at this meeting for BMP Version 3.3 – a single accreditation model – and corresponding new logo



BMP Development Committee – A Look Ahead

- Committee worked on revisions to streamline and strengthen the BMP guide and program
- Next steps will be a HAZMAT guide and further edits to strengthen the BMP with the goal of readying the document to be considered for a consensus standard



Speaker: Roy Resto, President, Aviation Integrated Management Solutions Consulting, LLC



REcycle

REtire

REsale

AFRA PANEL PRESENTS:



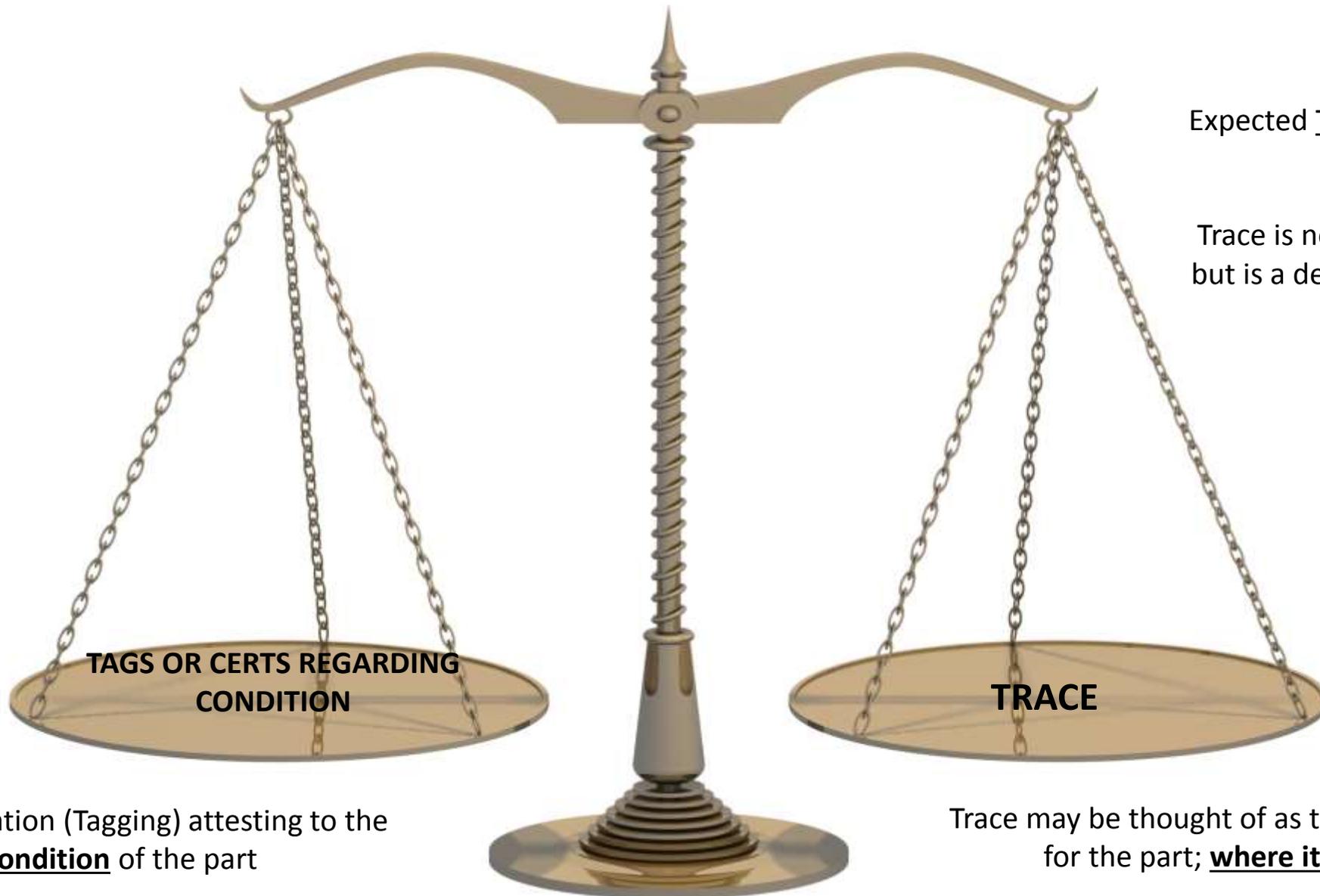
DOCUMENTATION FOR PARTS



AGENDA TOPICS:

- ***Tags and Trace Overview***
- ***Part Identification Tagging Options***
- ***Draft FAA Advisory Circular regarding who can issue 8130-3's***
- ***Trace Overview***
- ***ATA Spec 106 Material Certification***
- ***Non-Incident Statement or Incident / Accident Clearance Statement***

Generally, for aircraft parts to sell, **TWO** elements must be satisfactorily addressed: NOTE: There is great variation on this depending on stated condition. For example, any part may be sold 'As-Is' without such requirements being met.



Documentation (Tagging) attesting to the condition of the part

Expected Trace is tied to the part's condition.

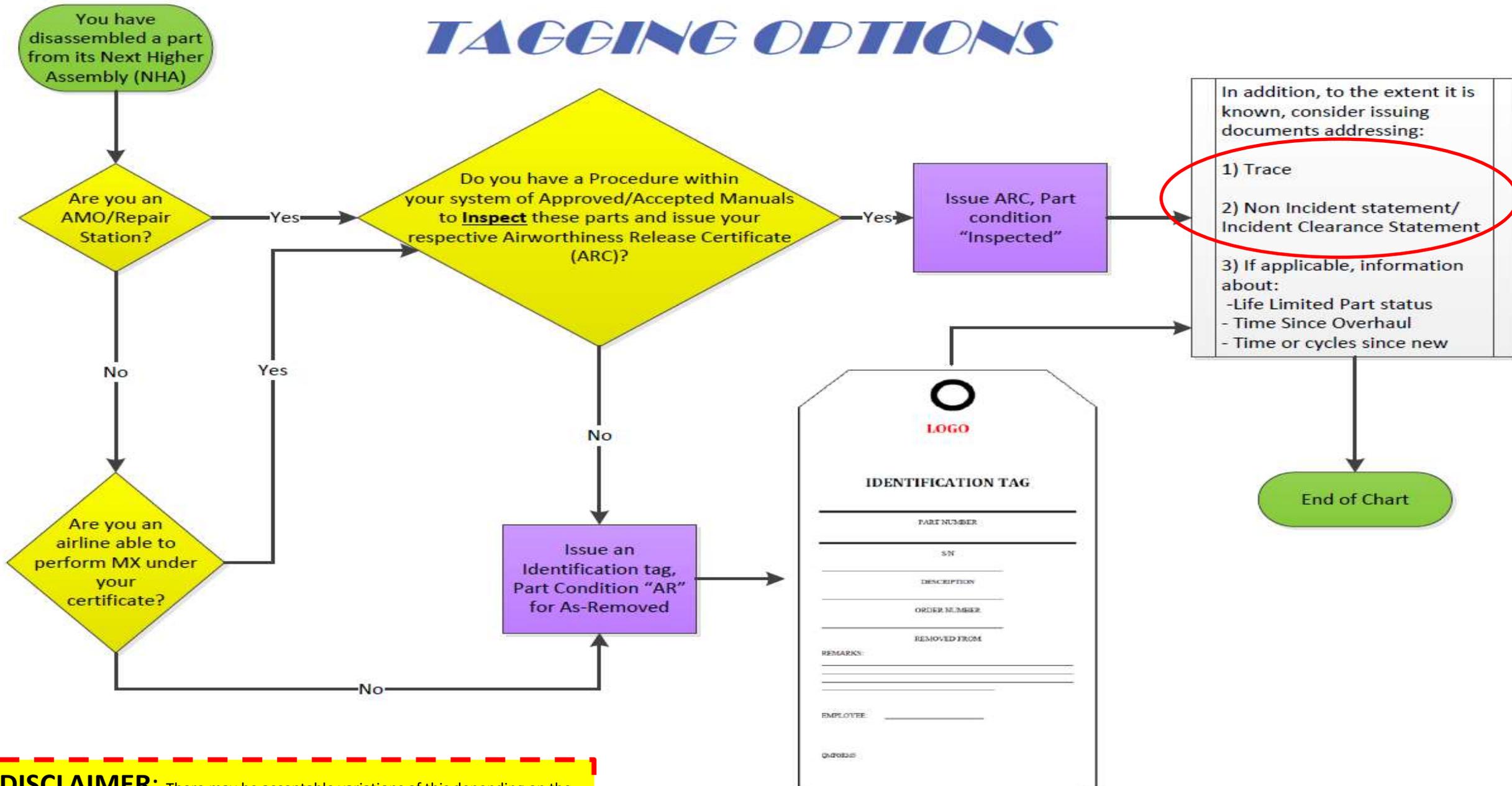
Trace is not regulatorily required, but is a de-facto industry practice.

Trace may be thought of as the chain of custody for the part; where it came from.



BEST PRACTICE (V)(d) 1 – For each part removed from the Asset, the disassembly Facility shall prepare a disassembly identification tag to identify the part. Each tag shall be attached to the part or otherwise associated with it upon the part’s removal.

TAGGING OPTIONS



DISCLAIMER: There may be acceptable variations of this depending on the regulations of your respective CAA



NOTE: There is a move afoot to allow FAA Airframe and/or Powerplant Certificated Technicians the ability to issue FAA form 8130-3's under the authority of their own certificate number.

If so, it may be possible that such Technicians could issue 8130-3's for parts in, for example, "Inspected" condition

This would be particularly beneficial for Disassembly Firms who are not Airlines, AMO's, or Repair Stations!



Initially, to support this initiative, the FAA issued this draft AC:



“DRAFT”

Advisory Circular



U.S. Department
of Transportation
Federal Aviation
Administration

Subject: Use of FAA Form 8130-3 for
Approval for Return to Service
Under Part 43

Date: DRAFT

AC No: 43-ARTS

Initiated by: AFS-300

Change:

- PURPOSE.** This advisory circular (AC) discusses the procedures for the use of Federal Aviation Administration (FAA) Form 8130-3, Authorized Release Certificate, Airworthiness Approval Tag, for approval for return to service under Title 14 of the Code of Federal Regulations (14 CFR) part 43. This AC is not mandatory and does not constitute a regulation. This AC describes an acceptable means, but not the only means, to use FAA Form 8130-3. However, if you use the means described in the AC, you must follow it in all important respects.
- AUDIENCE.** This AC is for mechanics with an Airframe and/or Powerplant rating; 14 CFR part 145 air agencies; 14 CFR part 121 and 135 operators; and FAA personnel tasked with the review and oversight of said entities.

BUT!

In a letter dated 12 June 2017, several industry groups petitioned the FAA to use an alternative draft AC as shown below



U.S. Department
of Transportation
Federal Aviation Administration

Advisory Circular

Subject: COMPLETING TITLE 14 CFR
SECTION 43.9 MAINTENANCE RECORDS BY
MECHANICS, REPAIRMEN AND REPAIR
STATIONS
GENERAL

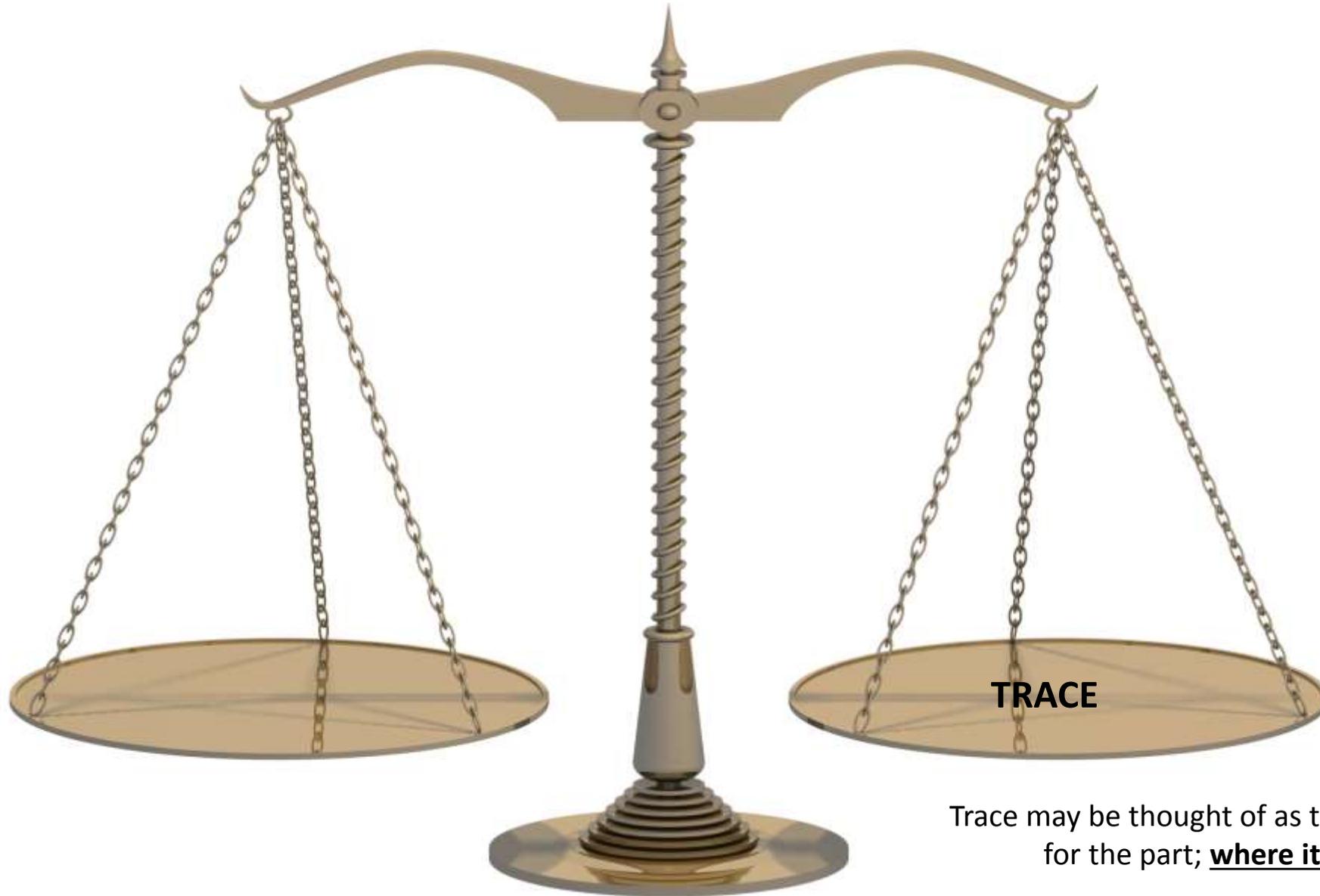
Date: DRAFT
Initiated by: AFS-340

AC No: 43-TBD
Change:

1. What is the purpose of the Advisory Circular (AC)?

- (a) This AC provides mechanic, repairmen and repair stations authorized to approve maintenance, preventive maintenance and alterations for return to service under [Title 14](#) of the Code of Regulations (14 CFR) [part 43](#) with acceptable methods for—
- Showing compliance with the maintenance record requirements in section [43.9](#).
 - Correcting or reissuing maintenance records.
 - Using the FAA Form [8130-3](#) to establish compliance with section [43.9](#).

Normally, for aircraft parts to sell, **TWO** elements must be satisfactorily addressed: NOTE: This excludes price



Trace may be thought of as the chain of custody for the part; **where it came from.**

QUESTION: What *is* Trace?

ANSWER: The ability via documentation to track aircraft parts, processes, and materials by lot, serial number or other means to the certificated source or manufacturer *(Ref:ATA SPEC 106)*

OR

Track Parts, processes, or materials to a source *(Ref: ASA-100)*

We're really talking about a chain of custody. *Emphasis is placed on the SELLER'S attestation* that they sold the part to whomever



A commonly used document to attest to a part's trace and condition is on the ATA Spec 106 Form, which is derived from this Specification:



ATA Specification 106

ATA Specification 106

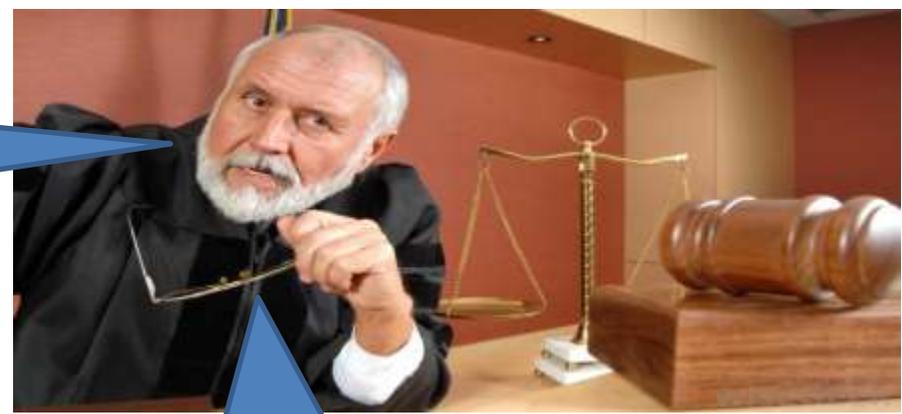
Sources & Approved Parts Qualification Guidelines

Revision 2001.1

Air Transport Association of America, Inc.
1301 Pennsylvania Avenue, NW - Suite 1100
Washington, DC 20004-1707
USA

To be perfectly clear, use of the form is NOT required by any regulation or standard. It is typically used because of one of two reasons:

- 1) Convenience
- 2) It was required by the customer's PO



Specification 106

ATA Specification 106

Sources & A

ALSO!

The form is not an Airworthiness Release Certificate!
Anyone can sign it, but typically it's someone authorized to do so on the Inspection Roster of the facility

Air Transport Association of America, Inc.
1301 Pennsylvania Avenue, NW - Suite 1100
Washington, DC 20004-1707
USA

1. PART OR MATERIAL CERTIFICATION FORM						ATA SPECIFICATION 106
2. Seller's Name			3. Reference #			
4. Organization Address:			Phone #: FAX #: SITA/Wire Code: Status: Supplier			
5a. Seller's Contract #			5b. Buyer's Contract #			
6. Item	7. Description	8. Manufacturer & Part #	9. Eligibility	10. Qty	11. Serial / Batch #	12. Status
13a. Remarks						
13b. Obtained From			13c. Last Certified Agency			
14. New Parts / Material Verification. The following signature attests that the Part(s) or material(s) identified above was (were) manufactured by a FAA Production Approval Holder (PAH), or to an industry or commercial standard.			18. Used, Repaired or Overhauled Parts Verification. The following signature attests that the documentation specified above or attached is accurate with regard to the item(s) described.			
15. Signature			19. Signature			
16. Name		17. Date	20. Name		21. Date	

Block 12 notes the condition of the part

Block 13A is traditionally used to enter the Non-Incident Statement (NIS). More on that to come

NOTE: Many users of this form prefer to use the term "Traceable To:" in block 13b

Notice: The above signature binds the seller and the SIGNER to the accuracy of the information provided in the Form. Should the information provided in this Form contain inaccuracies or misrepresentations, the signer and the SELLER may be liable for damage and be subject to criminal prosecution under state and federal law.

Landscape ATA Spec 106

MATERIAL CERTIFICATION FORM

1. Part or Material Certification		2. Seller's Masthead			3. Certificate Ref. No.	
4. Organization Telephone #: Fax #: SITA Code:		Address: Status:			5A. Work Order/Contract/Invoice (Sender)	
					5B. Work Order/Contract/Invoice (Buyer)	
6. Item	7. Description	8. Mfg. And Part No.	9. Eligibility	10. Qty.	11. Serial/Batch No.	12. Status/Work
13A. Remarks					13B. Obtained From	
					13C. Last Cert. Agency	
14. New Parts/Material Certification: The following signature attests that the part(s) or material(s) identified above was (were) manufactured and inspected in accordance with the Code of Federal Regulations 14 and/or established industry or U.S. Specifications.			18. Used, Repaired or Surplus Parts Certification: The following signature attests that the documentation above or attached is accurate with regard to the item(s) described. Repaired parts conform and were inspected in accordance with the Code of Federal Regulations 14 and are approved for return to service.			
15. Signature			16. Name (typed or printed)		17. Date	
16. Name (typed or printed)		17. Date				
15. Signature						



AVIATION WORKING GROUP

Doc: 1204/2/15

Incident / Accident Clearance Statement

Aircraft

NOTE: This work from the AWG has been incorporated into the IATA Document that follows



Guidance Material and Best Practices for Aircraft Leases

Effective May 2017

4.4 Incident/Accident Clearance Statement

Although there are no specific regulatory requirements to produce such documents, it is commonly accepted that an Incident/Accident Clearance Statement (ICS) formerly known as Non-Incident/Accident Statement (NIS) is provided by the last operator since the last shop visit. During the last shop visit, the engine/APU/gear is fully dismantled, the parts are inspected and repaired as necessary and their serviceability restored. It is therefore assumed that any part affected by incident, accident, or otherwise, has been replaced or properly repaired.

The purpose of this incident/accident clearance statement is to remove the focus from whether or not an aircraft/engine/part has been subjected to an accident or incident and instead declare that the aircraft/engine/part has been deemed acceptable for continued use.

Two document templates have been designed, one to cater for aircraft and the other for engines. The engine template could also be used for individual parts in circumstances where incident / accident clearance statements are required, alternatively the certification provided in paragraphs 1 & 2 could be included in the remarks section of the ATA106 Spec for commercial trace.

NOTE: This particular sample can be adopted for use with Components as well as the noted Engines

(ON COMPANY LETTERHEAD)

Date

Incident/Accident Clearance Statement

To Whom It May Concern:

Engine serial number [insert ESN], details of which are specified below, has been operated by [insert company name] during the period from [insert delivery date] to [insert redelivery date].

Configuration details as of date of this statement;

Description	Type/Part No.	Serial No.	TSN	CSN
Engine				

I hereby certify that, to the best of my knowledge, during the period stated above:

1. Neither the engine, nor any part installed have been
 - a. damaged during, or identified as the root cause of, a reportable incident or accident as defined by Annex 13 to the Chicago Convention, or
 - b. subjected to severe stress or heat (such as in a major engine failure, accident, or fire) or has been submersed in salt water,

unless its airworthiness status was re-established by an approved maintenance organisation in accordance with the instructions of the type certificate holder and/or OEM of the part, and supported by an authorised airworthiness release certificate.

2. No part has been installed on the engine which was obtained from a military source or was previously fitted to a state aircraft as deemed by Article 3 of the Chicago Convention.

Authorised Airline Representative

Signature: _____

Name: _____

Position: _____

Here's an excerpt of an ATA Spec 106 with the IATA/AWG Incident / Accident Clearance Statement in block 13a.

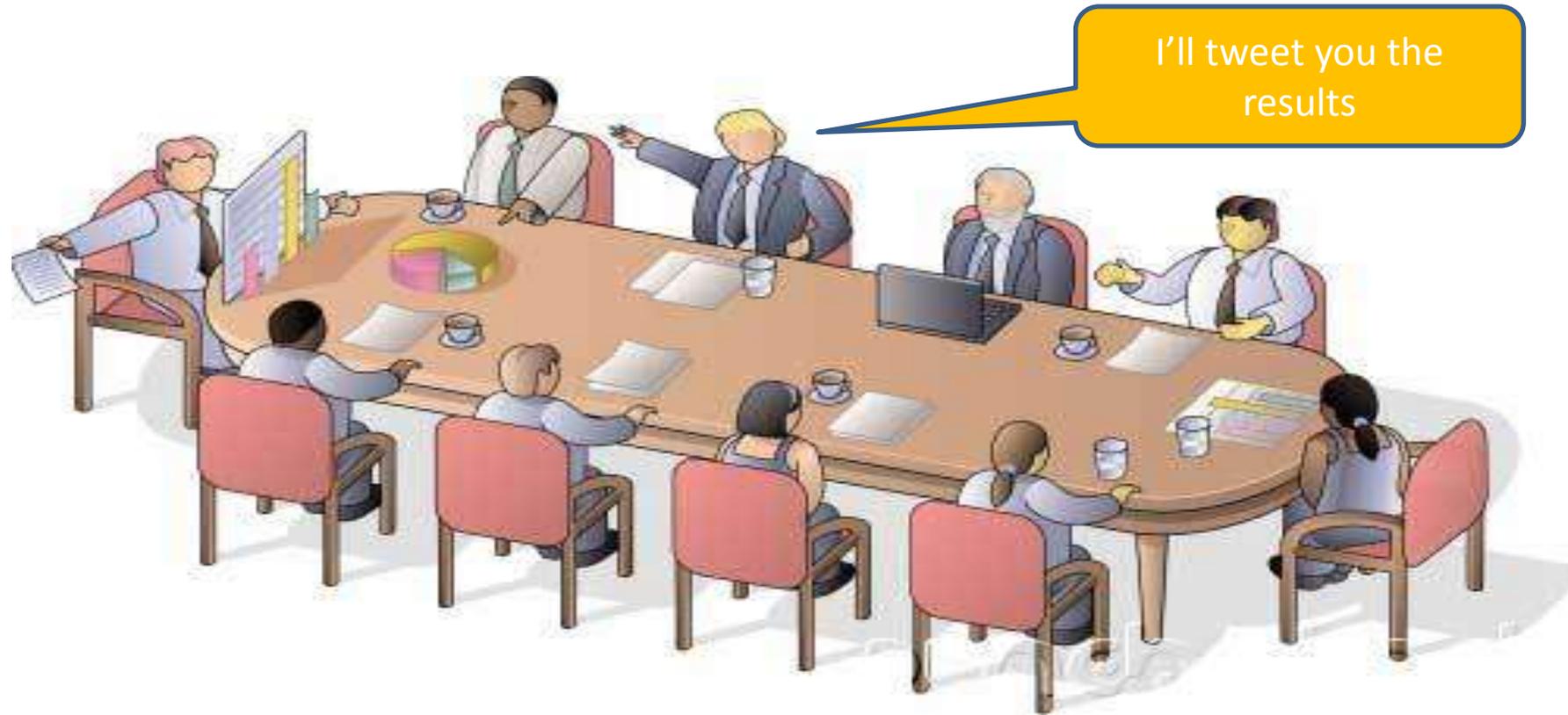
13a. Remarks

1. Neither the part, nor any part installed have been
 - a. damaged during, or identified as the root cause of, a reportable incident or accident as defined by Annex 13 to the Chicago Convention, or
 - b. subjected to severe stress or heat (such as in a major engine failure, accident, or fire) or has been submersed in salt water, unless its airworthiness status was re-established by an approved maintenance organisation in accordance with the instructions of the type certificate holder and/or OEM of the part, and supported by an authorised airworthiness release certificate.
2. No part has been installed on the engine which was obtained from a military source or was previously fitted to a state aircraft as deemed by Article 3 of the Chicago Convention.

13b. Obtained From

13c. Last Certificated Agency

NOTE: At this moment, there is a ASA Committee working with the Airlines For America (formally the Air Transport Association, ATA), to revise the ATA Spec 106, and hopefully to incorporate the new Incident / Accident Clearance Statement



Roy Resto is an experienced aviation industry professional having served in management positions with several firms, and is currently President of AIM Consulting Solutions. Most recently he was Vice President of Technical Operations for Tracer Corp. and Messier-Bugatti-Tracer, a family of aviation companies. Prior to this position, he was the COO of Quality Management Solutions LP, a consulting firm specializing in aircraft maintenance. In addition, Roy worked with American Airlines in their Maintenance and Engineering center where he retired as a level 5 Manager, and before that, with McDonnell Douglas. He was also a member of the US Air Force in the Reserves/ANG having served 32 years in Electronic Warfare and Avionics. Resto has served on the FAA's Suspected Unapproved Parts Steering Committee and the Aviation Suppliers Association Board of Directors.

Roy has an MBA in Finance from Oklahoma City University, a BS from Oklahoma State University, an AAS in Avionics from the Community College of the Air Force, and is an Aviation High School graduate. Complementing these, he has an FAA A&P license, an FCC Radiotelephone license with a RADAR endorsement, is an FAA DAR (Designated Airworthiness Representative), Instrument Rated Pilot, and speaks fluent Spanish. His website is: www.AimSolutionsConsulting.com



That's all folks!



Q & A





Contact AFRA as your resource for information on:

- Aircraft Dismantling & Recycling
- Industry Best Management Practices
- Audit and Accreditation Services
- Industry Contacts/Networking

Aircraft Fleet Recycling Association (AFRA)

www.AFRAassociation.org

info@AFRAassociation.org

+1 202 591 2478



@AFRAREcycles