



AFRA Best Management Practices



Aircraft Disassembly and Sales into the Chinese Marketplace



The Issue

- Chinese law requires that a part that is removed from an aircraft may only be installed in a (different) aircraft if it was:
 - Removed by a CCAR-145 repair station, and
 - Listed in a Chinese database recognized by CAAC
- Most disassembly facilities outside of China are not certificated under CCAR-145, so parts removed at these facilities are ineligible for installation in Chinese-registered aircraft

AFRA's CAAC-Disassembly Committee



- Committee
 - Lee McConnellogue
 - Maylin Salgado
 - Brent Webb

- AFRA Staff
 - Jason Dickstein
 - Tricia McFadden
 - Sam O'Connor

- Other Important Volunteers
 - Lynda Cheng
 - Michele Dickstein



CAAC Priorities

- CAAC just started to formally regulate disassembly in 2019
- CAAC wishes to prevent unserviceable and counterfeit parts from entering the Chinese market
 - Source of the parts (traceability) is very important to CAAC
 - Parts documentation is also important
- Among those parties permitted to enter the market, CAAC wishes to have some control, including the ability to revoke certification from parties who jeopardize the safety of the aviation system



Plan (Page One)

- AFRA would establish an English-language aircraft parts database for removed parts
- AFRA would update its BMP to address certain CAAC priorities
 - AFRA has remained open to aviation authority input and has solicited such input in the past from FAA and EASA



Plan (Page Two)

- CAAC would allow CCAR-145 (limited to disassembly privileges) for disassembly facilities outside of China
 - Ordinarily, this would require local Part 145 certification
 - CAAC would use the AFRA BMP as a baseline for eligibility for the program, *in lieu of local Part 145 certification*
- CAAC would inspect the applicants and upon a finding of compliance would issue CCAR-145 with disassembly privileges only
 - Subject to regular oversight by CAAC
 - CAAC may delegate some CCAR-145 inspection to AFRA *in the future if CAAC is satisfied with AFRA's performance*
- Such CCAR-145 facilities would be eligible to tag the removed parts and list them in the English language version of the removed parts database



Features of the Process

- This provides a path for AFRA members to obtain CCAR-145 certification
 - CCAR-145 certification is currently necessary to participate in the Chinese USM market
 - **The path is based on AFRA accreditation, so it demonstrates AFRA's relevance**
 - **This provides a *de facto* marketing benefit for AFRA**
- The process anticipates a development of trust between AFRA and CAAC
 - CAAC can potentially delegate more oversight to AFRA in the future as the level of trust grows
- The process may make CAAC a leader in the worldwide disassembly oversight process
 - If so, then AFRA becomes part of that leadership role



Most Recent Events

- AFRA CAAC Committee held regular video meetings with Xue Shijun and Pan Chao from CAAC
- CAAC and AFRA met in Beijing for a full day meeting to discuss the program
- AFRA has revised an operating manual and it is currently in CAAC's hands for their edits
- CAAC and AFRA have drafted an MOU to memorialize their cooperation
 - Expected signing in September 2023, when CAAC will be visiting the United States



Next Steps

- Continue to work with CAAC
 - Negotiate and draft working documents
 - We will continue to meet with CAAC; we should expect to meet in Los Angeles in September
- Develop the Database
 - AFRA will be expected to have a database for removed parts and CAAC has talked about AFRA confirming the parts listed in the database (e.g. through management of uploads as well as through the audits)
- Brief the Membership
 - When CAAC is satisfied with the proposed BMP changes, we hope to circulate the proposed changes to the AFRA membership for their input

Thank you!



Jason Dickstein

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AFRA Update

- AFRA has increased the existing board of directors by appointing a new director representing United Airlines, James Garcia.
- Through efforts of the current board, Tarmac re-engagement with AFRA has begun. Further update will be provided during the Farnborough International Air Show.
- AFRA has restarted all its committees, Research & Development, Strategy and Communications with strong chairpersons and active members.



AFRA Update

- AFRA has taken possession of composite material assets from a disassembled 787.
 - The wing tips were shipped to the National Manufacturing Institute of Scotland.
 - The remaining fuselage was shipped for storage at ecube in Ireland.
 - AFRA's research and development committee has kicked off a new project relating to determining and defining methods for the recycling, repurposing and reuse of end of service aircraft composite material.

- AFRA has provided input and participated in industry working groups relating to the circular economy and the need to define end of life policies/regulations.
 - Provided input on a report requested by EASA on end-of-life management
 - Participated on circular economy on a working group spearheaded by the European business network for Corporate Social Responsibility



AFRA Update

- AFRA has made a concerted effort to reestablish its presence on a worldwide basis.
 - The acceptance of AFRA BMP Disassembly standard by the CAAC
 - CAAC has publicly stated they accept our BMP for disassembly
 - Getting out philosophy and mission of AFRA via newsprint
 - Flight Global – on 787 disassembly and composite material recycling
 - Real Response Media – on MRO management



AFRA BMP Audit OFI's

- A stronger emphasis on arrangements for legal compliance
- A few cases of poor control of ESD protection
- Some processes/procedures would benefit from being documented
- Some internal audit programs could be more robust
- Change management not always as effective as it should be
- Supplier auditing could be strengthened
- A sign posting document showing how the management system and related procedures links to the BMP requirements is useful for more complex organizations



AFRA BMP Audit Observations/Opportunities For Improvement

- Contracted Disassembly flow down requirements
 - Contract
 - Training
- Disassembly Manual access



AFRA BMP Audit Observations/Opportunities For Improvement

- Part preservation and packaging
 - Lack of Consistency
 - Outside storage
- Parts not being subjected to extreme stress heat or environment



Thank You!
Question?