



## **DETECTING AND REPORTING OF SUSPECTED UNAPPROVED PARTS**

### **The relevant Regulations and other References**

CCAR Part 5 of the "Regeling nadere voorschriften toezicht luchtvaart (PB 2015 No. 60)".  
Title 14 CFR Part 21.

### **This Chapter applies to**

Any member of the aviation community, including aircraft maintenance personnel and organizations, aircraft operators, manufacturers and distributors of aeronautical products.

### **Why this industry guideline was written**

This industry guideline provides guidance to the aviation community for detecting suspected unapproved aircraft parts and reporting thereof to the Curaçao Civil Aviation Authority.

## **1. Introduction.**

- (1) The concept of airworthiness of an aeronautical product is that the product conforms to an approved design and is in a condition for safe operation. In order for the product to continue to be airworthy, any replacement or modification parts installed must also conform to an approved design.
- (2) The airworthiness of an aeronautical product containing unapproved parts is questionable because the part's type design and quality are unknown. Positive identification of unapproved parts is often difficult, due to the similarity of unapproved part's characteristics to those of approved parts.
- (3) The phrase 'Suspected Unapproved Parts' is utilized throughout this Chapter because of their unknown status or insufficient information about the parts at the time of their discovery.

## **2. Definitions**

### **Approved Parts**

The term "approved parts" is not synonymous with "a part that has received a formal CCAA approval."

Approved parts are identified as parts which have met one of the following requirements:

- (1) Produced under an FAA Parts Manufacturer Approval (PMA).
- (2) Produced under an FAA Technical Standard Order Authorization (TSO).
- (3) Produced during the Type Certificate (TC) application process or the Supplemental Type Certificate (STC) application process or produced during a TC or STC application process of a recognized National Airworthiness Authority (NAA), prior to the issue of the certificate; subsequently determined to conform to the approved TC or STC data.
- (4) Produced under a recognized NAA's TC without a separate production authorization.
- (5) Produced under a recognized NAA's PC (Production Certificate)
- (6) Approved in any other manner approved/acceptable to the Authority.

*Note 1: Parts which have been maintained, modified, or overhauled, and approved for return to service by approved maintenance organizations are considered to be approved parts. Parts which have been inspected and/or tested by persons authorized to determine conformity to an approved design data may also be found to be acceptable for installation.*

Revision date: 28 June 2019 Revision Number: 0	<b>Detecting and Reporting Suspected Unapproved Parts</b>	<b>CCAA-IG No. 2</b>	Page 1 of 6
--	---	--------------------------	----------------



*Note 2: Military surplus parts (defined as parts which have been originally released as surplus by the military, even if subsequently resold by manufacturers, owners/operators, maintenance organizations, or any other suppliers of parts) may fall under this condition.*

- (7) Produced as standard parts that conform to established industry or acceptable international specifications.

*Note 3: Standard parts are not required to be produced under an Approved Production Inspection System (APIS). Therefore, it is incumbent upon the installer, and the producer, to determine that the part conforms to the specified standard. The part must be identified as part of the approved type design or found to be acceptable for installation.*

- (8) Produced by an owner or operator for the purpose of maintaining or modifying their own product. For example, parts for an amateur built aircraft. These parts are not for sale as separate parts.
- (9) Manufactured by an approved maintenance organization during modification in accordance with an STC or CCAA approved design. These parts are not for sale as separate parts.
- (10) Manufactured by a qualified person in the course of a repair for the purpose of returning a type certificated product to service. These parts are not for sale as separate parts.

#### **Counterfeit Part**

A part made or modified so as to imitate or resemble an 'approved part' without authority or right, and with the intent to mislead or defraud by passing the imitation as original or genuine.

#### **Distributors**

Brokers, dealers, resellers, or other persons or agencies engaged in the sale of parts for installation in Type Certificated aircraft, aircraft engines, propellers, and in aeronautical products.

#### **Part(s) Not Acceptable for Installation**

A part which is not acceptable for installation on a type certificated product, including parts that are determined to be 'approved parts' but are awaiting maintenance.

#### **Product**

An aircraft, aircraft engine, or propeller, as defined in CCAR Part 5 of the "Regeling nadere voorschriften toezicht luchtvaart (PB 2015 No. 60)".

#### **Production Approval Holder (PAH)**

The holder of a PC (Production Certificate) or APIS (Approved Production Inspection System) authorization who controls the manufacture and quality of a product or part thereof.

#### **Reporter**

Any person who furnishes information regarding a SUP.

#### **Standard Part**

A part manufactured in complete compliance with an established industry or acceptable international specification which includes design, manufacturing, test and acceptance criteria, and uniform identification requirements; or for a type of part which the Authority has found demonstrates conformity based solely on meeting performance criteria, is in complete compliance with an established industry or acceptable international specification which contains performance criteria, test and acceptance criteria, and uniform identification requirements. The specification must include all information necessary to produce and conform the part and be published so that any party may manufacture the part. Examples include, but are not limited

Revision date: 28 June 2019 Revision Number: 0	<b>Detecting and Reporting Suspected Unapproved Parts</b>	<b>CCAA-IG No. 2</b>	Page 2 of 6
--	---	--------------------------	----------------



to, U.S. National Aerospace Standards (NAS), Army-Navy Aeronautical Standard (AN), and Society of Automotive Engineers (SAE).

**Supplier**

Any person who furnishes aircraft parts or related services at any tier to the producer of a product or part thereof.

**Suspected Unapproved Part (SUP)**

A part, component, or material that is suspected of not meeting the requirements of an 'approved part'. A part that, for any reason, may not be approved. Reasons may include findings such as a different finish, size, color, improper or lack of identification, incomplete or altered paperwork or any questionable indication.

*Note 4: The following parts, while they do not comply with the regulations, are not intended to be reported and investigated under the SUP program:*

- *An approved part which is used in the wrong application;*
- *A part manufactured or maintained by an approved source which is determined to depart from the type design, i.e. part which departs or escapes from the manufacturing or maintenance facility's quality system.*

**Unapproved Part**

A part that does not meet the requirements of an "approved part" (refer to definition of "Approved Parts" above). This term also includes parts which have been improperly returned to service (contrary to the applicable regulations) and/or parts which may fall under one or more of the following categories:

- (1) Parts shipped directly to the user by a manufacturer, supplier, or distributor, where the parts were not produced under the authority of, and in accordance with a production approval issued by an NAA for the part. For example, production overruns where the parts did not pass through an approved quality system.

*Note 5: This includes parts shipped to an end user by a PAH's supplier who does not have direct ship authority from the PAH.*

- (2) New parts which have passed through a PAH's quality system which are found not to conform to the approved design/data.

*Note 6: Parts damaged due to shipping or warranty issues are not required to be reported as SUP.*

- (3) Parts that have been maintained, modified, overhauled, or approved for return to service by persons or facilities not authorized to carry out such services under regulations of an NAA.

- (4) Parts that have been maintained, modified, overhauled, or approved for return to service which are subsequently found not to conform to approved/acceptable data.

*Note 7: (a) This would include parts produced by an owner/operator for the purpose of maintaining or modifying their own product, which have been approved for return to service, and found not to conform to approved data.*

*(b) This does not include parts currently in the inspection or repair process, such as parts removed for maintenance. Parts in this status may be considered not acceptable for installation.*

Revision date: 28 June 2019 Revision Number: 0	<b>Detecting and Reporting Suspected Unapproved Parts</b>	<b>CCAA-IG No. 2</b>	Page 3 of 6
--	---	--------------------------	----------------



(5) Counterfeit parts.

### **3. Detection Procedures.**

Organizations involved in the manufacture, distribution or maintenance of aeronautical products should ensure that their quality control systems include procedures for detection of unapproved parts. The following guidelines offer a means by which 'approved parts' and their sources may be assessed.

#### **3.1 Procurement Process**

(1) A procedure to prevent procurement of unapproved parts should be established prior to purchasing parts and materials for installation in type-certificated products. This procedure should include the following as a minimum:

- Methods to establish qualified suppliers who are authorized to manufacture and distribute parts they supply.
- Criteria to identify and screen potential unapproved parts suppliers. The criteria should include the following considerations:
  - The quoted price or the price advertised in trade magazines is significantly lower than the price quoted by other suppliers of the same part.
  - A delivery schedule that is significantly shorter than that of other suppliers of the same part when existing stocks are exhausted.
  - The inability of a supplier to provide drawings, specifications, overhaul manuals, or substantiating data demonstrating the conformity of the part's repair/overhaul.
  - A distributor and/or supplier's inability or unwillingness to provide substantiating documentation that the part was produced pursuant to an NAA's approval; or inspected, repaired, overhauled, preserved or modified in accordance with the regulations.
  - Sales quotes or discussions that create the perception that an unlimited supply of parts, components, or material is available to the end user.

#### **3.2 Acceptance Procedures**

These procedures should include a means of identifying SUPs during the receiving inspection and prevent their acceptance. Suggested areas to be addressed include the following:

- (1) Confirm the packaging of the part identifies the supplier or distributor and is free from alteration or damage.
- (2) Verify that the actual part and delivery receipt reflect the same information as the purchase order regarding part number, serial number, and historical information, if applicable.
- (3) Verify that the identification on the part has not been tampered with. For example, serial number stamped over, label or part/serial numbers improper or missing, vibro-etch or serial numbers located at other than the normal location.
- (4) Ensure that the shelf life and/or life limit has not expired, if applicable.
- (5) Conduct a visual inspection of the part and supporting documents to the extent necessary to determine if the part is traceable to an NAA's approved source.

The following are examples of positive forms of identification:

- a) DOT Canada Airworthiness Approval Tag 24-0078.
- b) FAA Form 8130-3, Airworthiness Approval Tag.
- c) Joint Aviation Authorities (JAA) Form One.
- d) Form CCAA-M-11, Airworthiness Approval Tag.
- e) Maintenance records or release document with approval for return to service.

Revision date: 28 June 2019 Revision Number: 0	<b>Detecting and Reporting Suspected Unapproved Parts</b>	<b>CCAA-IG No. 2</b>	Page 4 of 6
--	---	--------------------------	----------------



- f) Appropriate TSO markings.
  - g) Appropriate PMA markings.
  - h) Shipping ticket / invoice from PAH.
  - i) Direct ship authority letter from PAH.
- (6) Evaluate any visible irregularities. For example, altered or unusual surface, absence of required plating, evidence of prior usage, scratches, new paint over old, attempted exterior repair, pitting or corrosion.
- (7) Conduct random sampling of standard hardware packaged in large quantities in a manner which corresponds to the type and quantity of the parts.
- (8) Segregate parts of questionable nature and attempt to resolve issues regarding questionable status of part. For example, obtain necessary documentation if inadvertently not provided, or determine if irregularities are a result of shipping damage and handle accordingly.

### **3.3 Supplier Evaluations**

Procedures to conduct audits of suppliers on a scheduled basis, to ensure that suppliers have established and continue to maintain the quality system specified in purchase orders, should be developed. The following are examples of elements that should be included in an audit program:

- Continued validity of CAA's approval, if applicable;
- Design data control, to include latest revision, if applicable;
- Supplier control;
- Material handling/control;
- Manufacturing/assembly controls;
- Tool and gauge control;
- Tests and inspections;
- Records.

## **4. Reporting Guidelines**

### **4.1 General**

- (1) To assist in reporting SUPs, the Authority has produced a SUP Report Form (Form CCAA-M-28). This form provides a standardized format which facilitates the submission of complete data and reduces the time and cost associated with processing the reports. The details on CCAA Form M-28 may be entered by either machine/computer printing or by hand using block capitals.
- (2) When reporting a SUP, you should provide as much descriptive information as possible on the part. Any attachment, such as photographs and sketches of the suspected part, are also appreciated. However, you should not submit any physical parts to the Authority.
- (3) The use of abbreviations should be kept to a minimum, unless used universally.

### **4.2 Reporting**

When you discover a SUP, you should complete and forward the form immediately to the CCAA by any of the following means:

- By Mail:

mark 'IN-CONFIDENCE' if confidentiality is required and mail from anywhere within Curaçao, a duly completed Form CCAA-M-28 on the following address:

Revision date: 28 June 2019 Revision Number: 0	<b>Detecting and Reporting Suspected Unapproved Parts</b>	<b>CCAA-IG No. 2</b>	Page 5 of 6
--	---	--------------------------	----------------



Curaçao Civil Aviation Authority.  
Attention: Airworthiness Division.  
Seru Mahuma z/n, Curaçao.

- By Electronic Mail:

mark 'IN-CONFIDENCE' if confidentiality is required and send by electronic mail, a duly completed Form CCAA-M-28 on the following address:

civilair@gobiernu.cw

- By Fax:

When confidentiality is not required, you can Fax the completed SUP Report Form to the following number:

+5999-868-9924. (Attention: Airworthiness Division)

## 5. Handling of Reported Information by the Authority

The CCAA's policy is to encourage persons to report safety breaches or other circumstances affecting safety. Generally, the CCAA will not cause prosecution or enforcement proceedings to be instituted in respect of unintentional or inadvertent breaches of CCAR's, but this will depend upon all the circumstances of the breach.

## 6. Notification of SUPs to industry

The CCAA will disseminate safety information resulting from its investigation of SUP and SUP notifications received from other CAAs.

Based on the information discovered by the SUP investigation and any other relevant information, the CCAA will determine whether the unsafe condition warrants the issuance of an Airworthiness Directive (PAL) pursuant to CCAR Part 5 of the "Regeling nadere voorschriften toezicht luchtvaart (PB 2015 No. 60)".

## 7. Notification of SUPs to the Type Certificate Holder and Regulatory Agencies

The Director of the CCAA, upon receipt of the SUP reports, will submit all SUP Reports to the Type Certificate Holder and the State of Design.

Curaçao Civil Aviation Authority,



Drs. H.P.T de Jong,  
Director General.

Approval date: 28 June 2019

Revision date: 28 June 2019 Revision Number: 0	<b>Detecting and Reporting Suspected Unapproved Parts</b>	<b>CCAA-IG No. 2</b>	Page 6 of 6
--	---	--------------------------	----------------