



NOTICE OF PROPOSED AMENDMENT (NPA) NO 2012-03

DRAFT DECISION OF THE EXECUTIVE DIRECTOR OF THE EUROPEAN AVIATION SAFETY AGENCY

amending Decision No 2003/19/RM of the Executive Director of the European Aviation Safety Agency of 28 November 2003 on acceptable means of compliance and guidance material to Commission Regulation (EC) No 2042/2003 of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks

and

DRAFT OPINION OF THE EUROPEAN AVIATION SAFETY AGENCY

for a Commission Regulation amending Commission Regulation (EC) No 2042/2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks

'Control of suppliers of components and material used in maintenance'

EXECUTIVE SUMMARY

This NPA is aimed at providing clear requirements and detailed guidance material in order to ensure that the risks associated to the acceptance of components from external suppliers are mitigated. To that end, this NPA proposes:

- A new requirement 145.A.42(a), for part-145 organisations to establish procedures for the acceptance of components.
- AMC and GM to 145.A.42 (a) on the contents of such procedure and how to implement a supplier evaluation control procedure.

Furthermore, this NPA includes an amendment to AMC 145.A.42 (b), AMC M.A.501 (b) and new GM 145.A.42 (b) and GM M.A.501 (b) in order to clarify the means to check the eligibility of a component for installation.

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A. Explanatory Note

I. General

- The purpose of this Notice of Proposed Amendment (NPA) is to envisage amending Annex II (Part-145) to Commission Regulation (EC) No 2042/2003¹ paragraph 145.A.42 and Decision 2003/19/RM of the Executive Director of 28 November 2003² to develop AMC/GM material to paragraph 145.A.42. The scope of this rulemaking activity is outlined in Terms of Reference (ToR) RMT.0093 (145.017) issue 1 dated 15 April 2011 and is described in more detail below (see section IV).
- 2. The European Aviation Safety Agency (hereinafter referred to as 'the Agency') is directly involved in the rule-shaping process. It assists the Commission in its executive tasks by preparing draft regulations, and amendments thereof, for the implementation of the Basic Regulation³ which are adopted as 'Opinions' (Article 19(1)). It also adopts Certification Specifications, including Airworthiness Codes and Acceptable Means of Compliance and Guidance Material to be used in the certification process (Article 19(2)).
- 3. When developing rules, the Agency is bound to follow a structured process as required by Article 52(1) of the Basic Regulation. Such process has been adopted by the Agency's Management Board and is referred to as 'The Rulemaking Procedure'⁴.
- 4. This rulemaking activity is included in the Agency's Rulemaking Programme for 2012-2015. It implements the rulemaking task RMT.0093 (145.017).
- 5. The text of this NPA has been developed by the Agency. It is submitted for consultation of all interested parties in accordance with Article 52 of the Basic Regulation and Articles 5(3) and 6 of the Rulemaking Procedure.
- 6. The proposed rule has taken into account the development of European Union and International law (ICAO), and the harmonisation with the rules of other authorities of the European Union main partners as set out in the objectives of article 2 of the Basic Regulation. The proposed rule;
 - takes into account the European Vision for standards from the European Commission (Communication on a strategic vision for European standards COM(2011)311⁵);

- ⁴ EASA MB Decision 01-2012 of 13 March 2012 amending and replacing MB Decision 08-2007 concerning the procedure to be applied by the Agency for the issuing of opinions, certification specifications and guidance material ('Rulemaking Procedure').
- ⁵ <u>http://ec.europa.eu/enterprise/policies/european-standards/files/standardization/com-2011-311_en.pdf</u>.

¹ OJ L 315, 28.11.2003, p. 1. Regulation as last amended by Commission Regulation (EU) No 1149/2011 (OJ L 298, 16.11.2011, p. 1).

² Decision No 2003/19/RM of the Executive Director of the Agency of 28.11.2003 on acceptable means of compliance and guidance material to Commission Regulation (EC) No 2042/2003 of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks. Decision as last amended by Decision 2011/011/R of the Executive Director of the Agency of 28 November 2011.

³ Regulation (EC) No 216/2008 of the European Parliament and of the Council of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC (OJ L 79, 19.03.2008, p. 1). Regulation as last amended by Regulation 1108/2009 of the European Parliament and of the Council of 21 October 2009 (OJ L 309, 24.11.2009, p. 51).

- b. takes into account ICAO guidance contained in chapter 9.7 of Document 9760 Airworthiness Manual vol II; and
- c. takes into account FAA Advisory Circular AC00-56A⁶.

II. Consultation

- 7. To achieve optimal consultation, the Agency is publishing the draft decision of the Executive Director on its internet site. Comments should be provided within 3 months in accordance with Article 6(4) of the Rulemaking Procedure. Comments on this proposal should be submitted by one of the following methods:
 - **CRT:** Send your comments using the Comment-Response Tool (CRT) available at <u>http://hub.easa.europa.eu/crt/</u>.
 - **E-mail:** Comments can be sent by e-mail only in case the use of CRT is prevented by technical problems. The(se) problem(s) should be reported to the <u>CRT webmaster</u> and comments sent by email to <u>NPA@easa.europa.eu</u>.
 - **Correspondence:** If you do not have access to the Internet or e-mail, you can send your comments by mail to: Process Support Rulemaking Directorate EASA Postfach 10 12 53 50452 Cologne Germany

Comments should be submitted by **12 July 2012**. If received after this deadline, they might not be taken into account.

III. Comment response document

8. All comments received in time will be responded to and incorporated in a comment response document (CRD). The CRD will be available on the Agency's website and in the Comment-Response Tool (CRT).

IV. Content of the draft Opinion/Decision

Background

- 9. The use of components supplied by external sources enables Part-145 organisations to carry out maintenance in a cost effective-manner by allowing them to benefit from the worldwide market competition. Acceptance of components is a routine process in the daily activities of any Part-145 maintenance organisation, therefore, clear requirements and detailed guidance material are necessary to ensure mitigating the risks associated to such process.
- 10. Acceptance of components from external sources has revealed several issues⁷ with suppliers for many years, such as the supply of unapproved parts or counterfeit parts, which may represent a risk to aviation safety. The need to minimise these issues was the origin of FAA AC00-56, which describes a system for the voluntary accreditation of civil aircraft parts distributors on the basis of voluntary industry oversight, and JAA leaflet 46⁸ which was issued with the objective to implement a

⁶ FAA Advisory Circular 00-56: Voluntary industry distributor accreditation programme.

⁷ Examples can be found in FAA unapproved parts notifications numbers 2002-00062, 2005-000168 and 2008-200700111.

⁸ JAA leaflet 46: Aeronautical component distributors/ part dealers JAA-NAA recognition.

system for recognition of standards developed by distributor co-operative groups. This leaflet was never transferred into the EASA regulatory material.

- 11. ICAO airworthiness manual 9760 volume II paragraph 9.7 recognizes the influence that suppliers have over the control of unapproved parts and highlights the importance of 'buying from those suppliers having a known satisfactory record'.
- 12. The voluntary industry distributor accreditation program (AC00-56) 2004 audit report from the FAA acknowledges that the cooperative effort collaboration between industry and the FAA has improved the level of certitude in aviation parts, and, therefore, has raised the level of safety⁹.
- 13. ENAC circolare NAV-67 dated on 26/6/2003 recommends maintenance organisations to assess carefully their distributors of parts in order to prevent the provisioning of unapproved parts.

Proposed amendment

- 14. Part-145 requires in point 145.A.42 (a) the classification and segregation of components in different categories. In addition, the Maintenance Organisation Exposition (MOE) contents listed in AMC 145.A.70 include supplier evaluation procedures and acceptance/ inspection of aircraft components and material from outside contractors. However, the current regulation does not provide guidance on how the suppliers of components should be evaluated.
- 15. Furthermore, improvement in the regulatory and guidance material is needed to adapt to the business evolution, in particular to the benefit from the development of industry standards and best practice and to harmonise with foreign regulatory partners.
- 16. The objectives of this rulemaking task established in the ToR, are to include requirements and guidance material to help organisations to:
 - reduce risks associated to the use of external suppliers;
 - reduce burden and costs associated to the evaluation of suppliers which serve to more than one maintenance organisation.
- 17. During the rulemaking development three meetings were held by the working group. Several options were identified and assessed that would help meeting those objectives. These options and the pros and cons associated to each option are described in the RIA contained in section V.
- 18. The terminology used in the existing material is very diverse. The FAA AC00-56A and ENAC circolare NAV-67 refer to 'distributors' whereas ICAO airworthiness manual and AMC 145.A.70 refer to 'suppliers'. The term that will be used in the proposed amendment is 'suppliers' meaning any source of components and material external to the approved part-145 organisation. These external sources could be distributors, other approved part-145 organisations, original equipment manufacturers (OEM), operators, etc.
- 19. The working group agreed that the proposal should tackle the need to mitigate the risks associated with the use of suppliers of components. As a result the course of action agreed by the working group consisted of, firstly, an **amendment to 145.A.42** to add a new paragraph (a) to require organisations to implement procedures to ensure that components and material received from suppliers are in satisfactory condition and meet the applicable requirements.

⁹ Voluntary Industry Distributor Accreditation Program (AC 00-56) FY 2004 Audit Report, September 22, 2004.

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- 20. Secondly **a new AMC 145.A.42 (a) is added** to describe the elements that may be contained in the procedure required by 145.A.42 (a). These elements are:
 - a. Incoming inspection of the components and material received from suppliers. The inspection should consist of a physical inspection to detect obvious damage and a verification that the accompanying documentation and data complies with the requirements of 145.A.45 (b).
 - b. Supplier evaluation. This does not necessarily mean an on-site audit. Other means of control including desk-top evaluation may be adequate provided the approval holder can justify the use of the means of control selected.
- The working group considered that inadequate or the lack of procedures on how to evaluate suppliers may result on the acceptance and installation of non-conforming parts, unapproved parts or counterfeit parts. Thus, thirdly, **a new GM 145.A.42(a)** is proposed by the working group.
- 22. Point (1) of GM 145.A.42 (a) lists the elements that may be checked for the evaluation of a supplier's quality system, as appropriate. The organisations may use this list of elements as guidance when preparing their supplier evaluation procedures. It has to be noted, however, that such procedures should be adapted to the nature of each organisation and each supplier. There might be cases when one or several of the elements are not applicable to a particular supplier.
- 23. The working group acknowledged the existence of industry standards for suppliers' evaluation which are widely recognised by the air transport sector and implemented worldwide, and the fact that the use of standards is an excellent tool to facilitate international trade, competition and the acceptance of innovations by markets. The working group considered that those suppliers certified to a standard that has quality system requirements with the elements listed in point (a) of GM 145.A.42(a) may be acceptable. To this end, the working group members reviewed EN/AS9120¹⁰, EASO 2012¹¹ and ASA-100¹² standards. Appendix I to this NPA includes a comparison table between the elements of point (1) of GM 145.A.42 (a) and the requirements of point (1) of GM 145.A.42 (a) and the requirements of point (1) of GM 145.A.42 (a) and the requirements of point (1) of GM 145.A.42 (a) and the requirements of point (1) of GM 145.A.42 (a) and the requirements of point (1) of GM 145.A.42 (a) and the requirements of EASO 2012 and Appendix III to this NPA includes a comparison table between the elements of ASA-100.
- 24. Additionally, the group identified the need to improve harmonisation with the FAA, that has developed a voluntary supplier accreditation programme, specially taking into account the importance of the US aviation suppliers sector worldwide. To this end, the working group members reviewed AC00-56A and compared the quality system requirements with those included in point (1) of GM 145.A.42 (a). Appendix IV to this NPA includes a comparison table between the elements of point (1) of GM 145.A.42 (a) and AC00-56A.
- 25. Fourthly, as a result of these comparisons a **new point (2) is added to GM 145.A.42 (a)** which has the objective to promote the use of best practices, improve international harmonisation and catch up with the market evolution.

¹⁰ EN/AS9120: Quality management systems requirements for aviation space and defence distributors. (<u>www.asd-stan.org</u>).

¹¹ EASO2012: European Aviation Suppliers Organisation quality management standard. (www.easo.aero).

¹² ASA-100: Aviation Suppliers Association Quality System Standard (<u>http://www.aviationsuppliers.org/ASA/files/ccLibraryFiles/FILENAME/00000000035</u> /ASA-100%20Rev%203-5.pdf).

Furthermore, comprehensive supplier evaluation and reliance on industry standards may reduce the need for multi-oversight of the suppliers by the different part-145 organisations that use such supplier.

- 26. Additionally to the amendments proposed above, the Agency has considered necessary to review AMC 145.A.42 (b) since several stakeholders and competent authorities have expressed concerns about its understanding. This review resulted in:
 - a. Rewording AMC 145.A.42 (b) and a new GM 145.A.42 (b)
 - b. Consequently, and in order to ensure consistency AMC M.A.501 (b) has also been reworded and a new GM M.A.501 (b) has been issued and M.A.501 (b) is amended.

The envisaged change to Annex I (Part-M) to Regulation 2042/2003 is:

i. Point M.A.501 (b) is amended to align the wording with 145.A.42 (b)

The envisaged changes to Annex II (Part-145) to Regulation 2042/2003 are:

- ii. Point 145.A.42 (a) is changed to 145.A.42 (e);
- iii. New point 145.A.42 (a) is added.

The envisaged change to Decision 2003/19/RM / Regulation 2042/2003 are:

- i. AMC M.A.501 (b) is amended;
- ii. A new GM M.A.501 (b) is added;
- iii. Point AMC 145.A.42 (a) is changed to AMC 145.A.42 (e);
- iv. A new AMC 145.A.42 (a) is added;
- v. A new GM 145.A.42 (a) is added;
- vi. Point AMC 145.A.42 (b) is amended;
- vii. A new GM 145.A.42 (b) is added.

V. Regulatory Impact Assessment

1. Process and consultation

This NPA has been developed by the 145.017 working group, which is formed by industry and competent authorities' representatives. The NPA will be published for consultation in order to allow all affected stakeholders to make comments and propose amendments.

2. Issue analysis and risk assessment

2.1. Issue which the NPA is intended to address and sectors concerned.

The NPA is trying to address the risks associated to the supply and acceptance of components and material from external sources, such as the acceptance of unapproved or counterfeit components, the receipt of components that have been inadequately stored or that have suffered damaged during handling or shipment.

The current advisory material does not provide for any means or guidance on how the suppliers of components should be evaluated and controlled. The proposal of this NPA includes guidance material that could be used by organisation to implement procedures to mitigate such risks. Moreover, the proposal takes into

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account industry best practices and foreign regulatory material in order to deliver cost-effective, widely acceptable guidance.

The issue affects Part-145 organisations, component suppliers, operators and national aviation authorities (NAA).

2.2. What are the risks (probability and severity)?

Inadequate procedures or the lack of procedures on how to evaluate suppliers may result on the acceptance and installation by the Part-145 organisation of nonconforming parts, unapproved parts and counterfeit parts. The worst foreseeable situation would be that the failure of the installed non-conforming or un-approved parts or counterfeit parts could have catastrophic consequences; however, this occurrence is considered improbable.

Proper evaluation and selection of suppliers would help reducing the number of findings detected by Part-145 organisations during acceptance of components, such as components shipped with inadequate documentation, components non-conforming to the purchase order.

Currently, the regulation does not provide guidance for supplier evaluation nor the recognition of industry standards and best practices adopted by many organisations worldwide.

Currently, there are a total of 605 suppliers certified in accordance with AC00-56A¹³ and 1001 suppliers certified to the EN/AS9120¹⁴ standard. Without guidance from the Agency a two tier system could be foreseen in the future between those organisations that have adopted best practices and those that have not. Action is necessary to retain Agency's leadership in promoting best practices and encourage uniformity.

3. Objectives

The specific objective of this proposal is therefore to provide guidance for accomplishing supplier evaluation and control.

4. Options identified

Option No	Description	
0	Baseline option. Implementing Rules (IR) and AMC/GM remain unchanged; risks remain as outlined in the issue analysis.	
1	Provide guidance (AMC/GM) only (no IR change) on how to perform supplier evaluation.	
2	Amend the IR to add clarity to the requirements for acceptance or components and provide guidance material on how to perform supplie evaluation and identify acceptable industry standards for supplier quality systems.	
3	Add a requirement to the IR to mandate evaluation of suppliers and associated guidance.	

¹³ Source: <u>http://www.aviationsuppliers.org/FAA-AC-00-56-List</u>.

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¹⁴ Source: OASIS database <u>https://www.sae.org/?PORTAL_CODE=IAQG</u>.

4	Regulate suppliers.
5	Introduce a voluntary supplier accreditation system.

Analysis of the impacts 5.

Option 1: Provide guidance (AMC/GM) only (no IR change) on how to perform supplier evaluation.			
Impact type	Pros	Cons	Overall
Safety	This option would minimise the number of Part-145 organisation without supplier evaluation procedures or with inadequate procedures and therefore it would reduce the risk of unapproved/ non-conforming parts to reach the maintenance organisations. Limited impact since the	Not identified	The group considered that this option would have positive safety impact, although limited. Economically, this option
	amendment provides only guidance material		would impact negatively Part-145 organisations
Economic	The implementation by Part-145 organisation of adequate supplier evaluation procedures is expected to reduce the costs associated to refused/ rejected parts.	Part-145 organisations that have not implemented yet adequate supplier evaluation procedures in line with the proposed guidance material would have to issue new procedures.	and suppliers with inadequate procedures. However, in the long term these procedures would represent a reduction in the costs
		Suppliers that do not have in place adequate quality systems would have to initiate its implementation.	associated with refused parts.
Option 2: Amend the IR to add clarity to the requirements for acceptance of components, and provide guidance material on how to perform supplier evaluation and identify acceptable industry standards for supplier quality systems.			
Impact type	Pros	Cons	Overall
Safety impact	This option would minimize the number of Part-145 organisations without supplier evaluation procedures or with inadequate procedures and therefore it would reduce	Not identified	The group considered that this option would have positive safety effect, since the new

	the risk of unapproved/ non-conforming parts to reach the maintenance organisations.		requirement and the associated guidance material would reduce
Economic	The implementation by Part-145 organisation of adequate supplier evaluation procedures is expected to reduce the costs associated to refused/ rejected parts.	Part-145 organisations that have not implemented yet adequate supplier evaluation procedures in line with the proposed guidance material would have to issue new procedures. Suppliers that do not have in place adequate quality systems would have to initiate its implementation. Adding a new requirement might impact NAA that would have to amend their auditing forms and database.	the risk of unapproved/ non-conforming parts to reach the maintenance organisations. In addition provides flexibility for organisations to apply risk based evaluation and supports industry that have already adopted acceptable standards. AC00-56A certified suppliers: 605 (Source FAA database) EN/AS9120 certified suppliers: 1001 (OASIS database)
-	a requirement to the IR to mandate evaluation		
Impact type	Pros	Cons	Overall
Safety impact	This option would minimize the number of Part-145 organisations without supplier evaluation procedures or with inadequate procedures and therefore it would reduce the risk of unapproved/ non-conforming parts to reach the maintenance	Not identified	Positive impact

currently under evaluation

organisations.

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Positive safety impact by ensuring the evaluation of supplier that are not

Economic	The implementation by Part-145 organisation of adequate supplier evaluation procedures is expected to reduce the costs associated to refused/ rejected parts.	Part-145 organisations that have not implemented yet adequate supplier evaluation procedures will have to issue new procedures. A requirement mandating supplier evaluation would reduce the flexibility of the organisations to adapt the need for supplier evaluation based on risk assessment. The impact would be higher on medium and small organisations using suppliers sporadically.	Negative impact
		Suppliers that do not have in place adequate quality systems would have to initiate its implementation.	
		Adding a new requirement might impact NAA that would have to amend their auditing forms and database.	
Option 4: Reg	ulate suppliers		
Impact type	Pros	Cons	Overall
Safety impact	This option would minimise the risk of unapproved/ non-conforming parts to reach the maintenance organisations.	The failure of suppliers to be regulated (for non-EU products) may limit the availability of parts because	The group considered that overall this option would have negative
	The organisations would use only approved suppliers.	of the limited sources.	impact due to the expected decrease in competition and the
	Possibility to limit or cancel approval to suppliers with a negative record.		costs associated with the implementation of the
Economic	Uniformity on the quality of suppliers. Reduce the costs associated to refused/ rejected parts.	Foreign suppliers may not be interested on gaining an EU supplier approval which would reduce competition for sources of supply.	regulation on suppliers

	The organisations would not need to perform supplier evaluation.	This would have negative impact on Part-145 organisations to buy economically.	
		NAA would need to increase their resources to implement the regulation on suppliers (approval and oversight suppliers)	
		Suppliers would need to bear the costs associated to the implementation of the regulation (approval and oversight fees).	
Option 5: Volu	ntary supplier accreditation system		
Safety impact	This option would minimise the risk of unapproved/ non-conforming parts to reach the maintenance organisations. Limited impact since this is a voluntary programme.	Not identified	The group considered that overall this option would have negative impact due to the expected costs associated
Economic	It is expected to reduce the cost of refused/ rejected parts.	The voluntary programme may conflict with current industry best practices.	with the implementation of the voluntary supplier accreditation system.
		NAA resources would be required for running the programme.	
		Suppliers would need to bear the costs of the voluntary accreditation.	

6.2. Social impacts
None identified
6.4. Environmental impacts
None identified
6.5. Proportionality issues
None identified
6.6. Impact on regulatory coordination and harmonisation

6. Conclusion and preferred option

The preferred option is option 2: Amend Part-145 Implementing Rules to add clarity to the requirements for acceptance of components, and provide guidance material on how to perform supplier evaluation and identify acceptable industry standards for supplier quality systems.

B. Draft Opinion(s) and/or Decision(s)

The text of the amendment is arranged to show deleted text, new text or new paragraph as shown below:

- 1. deleted text is shown with a strike through: deleted
- 2. new text is highlighted with grey shading: new
- 3. ...

indicates that remaining text is unchanged in front of or following the reflected amendment.

I. Draft Opinion Part-M

M.A.501 Installation

...

(b) Prior to installation of a component on an aircraft the person or approved maintenance organisation shall ensure that the particular component is eligible to be fitted when different modification and/or airworthiness directive configurations may be applicable.

•••

II. Draft Opinion Part-145

145.A.42 Acceptance of components

(a) The organisation shall establish procedures for the acceptance of components and material.

(b) Prior to installation of a component, the organisation shall ensure that the particular component is eligible to be fitted when different modification and/or airworthiness directive standards may be applicable.

(c) The organisation may fabricate a restricted range of parts to be used in the course of undergoing work within its own facilities provided procedures are identified in the exposition.

(d) Components which have reached their certified life limit or contain a non-repairable defect shall be classified as unsalvageable and shall not be permitted to re-enter the component supply system unless certified life limits have been extended or a repair solution has been approved according to Part-21.

(a) (e) All components shall be classified and appropriately segregated into the following categories:

1. Components which are in a satisfactory condition, released on an EASA Form 1 or equivalent and marked in accordance with Part-21 Subpart Q.

2. Unserviceable components which shall be maintained in accordance with this section.

3. Unsalvageable components which are classified in accordance with 145.A.42(d).

4. Standard parts used on an aircraft, engine, propeller or other aircraft component when specified in the manufacturer's illustrated parts catalogue and/or the maintenance data.

5. Material both raw and consumable used in the course of maintenance when the organisation is satisfied that the material meets the required specification and has appropriate traceability. All material must be accompanied by documentation clearly

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relating to the particular material and containing a conformity to specification statement plus both the manufacturing and supplier source.

III. Draft Decision AMC and GM to Part-M

AMC M.A.501 (b) Installation

1. The EASA Form 1 identifies the airworthiness status of an aircraft component. Block 12 'Remarks' on the EASA Form 1 in some cases contains vital airworthiness related information (see also Part-M Appendix II) which may need appropriate and necessary actions.

2. The fitment of replacement Installation of a component components should only take place when the person referred to in M.A.801 or the M.A. Subpart F or Part-145 or the approved maintenance organisation is satisfied that such components meet required standards in respect of manufacture or maintenance, as appropriate.

- the component is in satisfactory condition and has been appropriately released
- ensures compliance with the applicable Critical Design Configuration Control Limitations,
- the installation of the component is not prohibited by an Airworthiness Directive, and,
- the component meets the required modification status. This may be accomplished by reference to the manufacturer's parts catalogue or other approved data (i.e. Service Bulletin).

3. The person referred to under M.A.801 or the M.A. Subpart F or Part-145 approved maintenance organisation should be satisfied that the component in question meets the approved data/standard, such as the required design and modification standards. This may be accomplished by reference to the (S)TC holder or manufacturer's parts catalogue or other approved data (i.e. Service Bulletin). Care should also be taken in ensuring compliance with applicable AD and the status of any service life-limited parts fitted to the aircraft component

GM M.A.501 (b) Installation

1. The EASA Form 1 identifies the airworthiness status of an aircraft component in relation to the work being certified. Block 12 'Remarks' on the EASA Form 1 in some cases contains vital airworthiness related information (see also Part-M Appendix II) which may need appropriate and necessary actions.

IV. Draft Decision AMC and GM to Part-145

AMC 145.A.42 (a) Acceptance of components

The procedures for acceptance of components should have the objective of ensuring that the supplied components and material are in satisfactory condition and meet the organisation's requirements. These procedures may be based upon:

- 1) incoming inspections which include:
 - physical inspection of components and/or material;
 - review of accompanying documentation and data, which should be acceptable in accordance with 145.A.42(e).
- 2) supplier evaluation and control.

AMC 145.A.42 (b) Acceptance of components

The EASA Form 1 or equivalent identifies the status of an aircraft component. Block 12 'Remarks' on the EASA Form 1 in some cases contains vital airworthiness related information which may need appropriate and necessary actions. The receiving organisation should be satisfied that the component in question is in satisfactory condition and has been appropriately released to service. In addition, the organisation should ensure that the component meets the approved data/standard, such as the required design and modification standard. This may be accomplished by reference to the manufacturer's parts catalogue or other approved data (i.e. Service Bulletin). Care should also be taken in ensuring compliance with applicable airworthiness directives, the status of any life-limited parts fitted to the aircraft component as well as Critical Design Configuration Control Limitations.

The organisation should establish a procedure to determine the eligibility of a component before installation. Such procedure should specify how the organisation:

- is satisfied that the component is in satisfactory condition and has been appropriately released,
- ensures compliance with the applicable Critical Design Configuration Control Limitations,
- ensures that the installation of the component is not prohibited by an Airworthiness Directive, and
- determines that the component meets the required modification status. This
 may be accomplished by reference to the manufacturer's parts catalogue or
 other approved data (i.e. Service Bulletin).

AMC 145.A.42 (a) (e) Acceptance of components

•••

GM 145.A.42 (a) Supplier evaluation and control

- The following elements may be checked for the evaluation and control of a supplier's quality system, as appropriate, to ensure that the component and/or material is supplied in satisfactory condition:
 - Availability of appropriate up to date regulations, specifications such as component manufacturer's data and standards;
 - Standards and procedures for training of personnel and competency assessment;
 - c. Procedures for shelf-life control;
 - d. Procedures for handling of electrostatic sensitive devices;
 - Procedure for identifying the source from which components and material were received;
 - Purchasing procedures identifying documentation to accompany components and material for subsequent use by approved Part-145 maintenance organisations;
 - g. Procedures for incoming inspection of components and materials;
 - h. Procedures for control of measuring equipment that provide for appropriate storage, usage, and for calibration when such equipment is required;
 - i. Procedures to ensure appropriate storage conditions for components and materials that are adequate to protect the components and materials from damage and/or deterioration. Such procedures should comply with manufacturers' recommendations and relevant standards;
 - Procedures for adequate packing and shipping of components and materials to protect them from damage and deterioration, including procedures for proper shipping of dangerous goods. (e.g. ICAO and ATA specifications);

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- k. Procedure for detecting and reporting of suspected unapproved components;
- Procedure for handling unsalvageable components in accordance with applicable regulations and standards;
- Procedures for batch splitting or redistribution of lots and handling of the related documents;
- Procedure notifying purchasers of any components that have been shipped and have later been identified as not conforming to the applicable technical data or standard;
- o. Procedure for recall control to ensure that components and materials shipped can be traced and recalled if necessary;
- p. Procedure for monitoring the effectiveness of the quality system.
- 2) Suppliers certified to officially recognised standards that have a quality system that includes the elements specified in 1) may be acceptable; such standards include:
 - a. EN/AS9120 and listed in the OASIS database;
 - b. ASA-100;
 - c. EASO 2012;
 - d. FAA AC00-56.

The use of such suppliers does not exempt the organisation from its obligations under 145.A.42 to ensure that supplied components and material are in satisfactory condition and meet the applicable criteria of 145.A.42(e).

GM 145.A.42 (b)

1. The EASA Form 1 identifies the airworthiness status of an aircraft component in relation to the work being certified. Block 12 'Remarks' on the EASA Form 1 in some cases contains vital airworthiness related information (see also Part-M Appendix II) which may need appropriate and necessary actions.

C. Appendices

Appendix I Comparison table point (1) of GM 145.A.42 (a) and the requirements of EN/AS9120

GM 145.A.42 (a)(1) quality system elements	EN/AS9120 requirement.
a. Availability of appropriate up to date	4.2.3 Control of Documents.
regulations, specifications and standards.	12.5 control of Documents.
b. Standards and procedures for training of	6.2.2 Competence, Training and
personnel and competency assessment.	Awareness
c. Procedures for shelf-life control.	7.5.5 Preservation of Product
d. Procedures for handling of electrostatic	7.5.5 Preservation of Product
sensitive devices.	
e. Procedure for identifying the source from which components and material were received.	7.5.3 Identification and Traceability
f. Purchasing procedures identifying	7.4 Purchasing
documentation to accompany components and	-
material for subsequent use by approved Part- 145 maintenance organisations.	-
 g. Procedures for incoming inspection of components and materials. 	7.4.3 Verification of Purchased Process
h. Procedures for measuring equipment control that provides for appropriate storage, usage, and calibration when such equipment is required.	
i. Procedures to ensure appropriate storage	6.3 Infrastructure
conditions for components and materials that	
are adequate to protect the components and	7.5.5 Preservation of Product
materials from damage and/or deterioration in	
accordance with manufacturers'	
recommendations and relevant standards.	
j. Procedures for adequate packing and shipping of components and materials for granting protection from damage and deterioration, including procedures for proper shipping of dangerous goods (e.g. ICAO and ATA	7.5.5 Preservation of Product
specifications).	
	7.4.1 Purchasing Process
suspected unapproved components.	7.4.3 Verification of Purchased Process
I. Procedure for handling of unsalvageable	
components in accordance with applicable	-
regulations and standards.	
m. Procedures for batch splitting or redistribution of lots and handling of the related documents.	8.2.5 Evidence of Conformity

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n. Procedure to notify purchasers of any	8.3 Control of Nonconforming Product
components that have been shipped and later	
been identified to not conform to the applicable	
technical data or standard.	
o. Procedure for recall control to ensure that	8.3 Control of Nonconforming Product
components and materials shipped can be traced	
and recalled if necessary.	
p. Procedure for monitoring the effectiveness of	8.4 Analysis of Data
the distributor's quality system.	

Appendix II	Comparison table point (1) of GM 145.A.42 (a) and the requirements
	of EASO2012

GM 145.A.42 (a)(1) quality system	EASO 2012 requirement
elements	
a. Availability of appropriate up to date	4.2.3 Control of documents.
regulations, specifications and standards.	
b. Standards and procedures for training of	6.2.2 Competence, Awareness and
personnel and competency assessment.	Training.
c. Procedures for shelf-life control.	7.5.5 Preservation of the product 2 Shelf life control including methods of disposal of time expired items
d. Procedures for handling of electrostatic sensitive devices.	7.5.5 Preservation of the product 1 (g) Documented procedures for g. Electrostatic Sensitive Devises (ESD)
e. Procedure for identifying the source from which components and material were received.	7.5.3 Identification and Traceability
f. Purchasing procedures identifying documentation to accompany components and material for subsequent use by approved Part-145 maintenance organisations.	7.4.1 Purchasing Process
g. Procedures for incoming inspection of components and materials.	7.4.2 Verification of Purchased Product
h. Procedures for measuring equipment control that provides for appropriate storage, usage, and calibration when such equipment is required.	7.5.6 Control of Monitoring and Measuring Equipment
i. Procedures to ensure appropriate storage conditions for components and materials that are adequate to protect the components and materials from damage and/or deterioration in accordance with manufacturers'	7.5.5 Preservation of the Product
recommendations and relevant standards. j. Procedures for adequate packing and shipping of components and materials for granting protection from damage and deterioration, including procedures for proper shipping of dangerous goods (e.g. ICAO and ATA specifications).	7.5.5 Preservation of the Product
k. Procedure for detecting and reporting of suspected unapproved components.	8.5.2 Corrective Action (g) There shall be a method for the reporting of Suspect Unapproved Parts,(SUPS).
 Procedure for handling of unsalvageable components in accordance with applicable regulations and standards. 	8.3 Control of nonconforming product 2. The review of nonconforming product and personnel with the authority and responsibility for the review shall be defined in documented procedures to include: The segregation of Unserviceable product that could be restored, scrapped

m. Procedures for batch splitting or redistribution of lots and handling of the related documents.	or life-expired product, and serviceable product and how product is scrapped and damaged to prevent possible fraudulent re-entry to the supply chain. 7.5.1 Control of Production and Service Provision
	1 () The Supplier shall document their system for control of parts split from original lot (split lots) to ensure that the certificate of conformance accompanying parts represents the lot from which they were manufactured.
n. Procedure to notify purchasers of any components that have been shipped and later been identified to not conform to the applicable technical data or standard.	8.3 Control of nonconforming Product 1. The Supplier shall have documented procedures for the identification, documentation, evaluation, segregation (when practical) disposition, and notification to affected customers or suppliers of nonconforming product.
o. Procedure for recall control to ensure that components and materials shipped can be traced and recalled if necessary.	8.3 Control of nonconforming Product 4. A documented procedure shall be in place to promptly notify customers in writing when it is discovered that discrepant product has been delivered. Notification shall include the concise description of the discrepancy, part and serial numbers affected, lot numbers, delivered quantities, and delivery dates.
p. Procedure for monitoring the effectiveness of the distributor's quality system.	 8.2.2 Internal Audit The Supplier shall conduct internal audits at planned intervals, at least once per year, to determine whether the quality management system a) conforms to the planned arrangements, to the requirements of this Standard and to the quality management system requirements established by the Supplier, and b) is effectively implemented and maintained.

GM 145.A.42 (a)(1) quality system elements	ASA 100 requirement
a. Availability of appropriate up to date regulations, specifications and standards.	1(E)(3) For distributors, the quality control manual shall include, but not be limited to a detailed description of:
	()
	3) the distribution and revision control system for the quality documentation and other technical data, where required.
	13(A) Technical data, when required, shall be maintained in a manner that ensures such data is up-to-date and accessible as appropriate. Hand entries or corrections to technical data are not acceptable.
b. Standards and procedures for training of personnel and competency assessment.	1(E)(5) For distributors, the quality control manual shall include, but not be limited to a detailed description of:
	()
	5) the organization's training requirements and records.
	4(A) The distributor shall have personnel who are properly trained to perform inspection, handling and recordkeeping procedures to support the organization's adopted quality system. This applies to personnel performing the function of supervisor, inspector, shipping and receiving.
	4(B) Inspection personnel shall be properly trained and authorized. Such persons shall be knowledgeable of inspection techniques, methods and equipment used to determine part quality. Authorization criteria shall be identified in the distributor's manual.
	4(C) All training, both formal (classroom) and on-the-job training (OJT), shall be documented and the records shall be maintained for all employees who underwent training. Training records shall be retained for at least two years after the employee has left employment with the company. Each training record shall include:
	 A description of the training;
	 Date(s) and length of instruction;
	 Name of the student;

Appendix III Comparison Table: Point (1) of GM 145.A.42 (a) and the requirements of ASA-100.

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	 Name of the person (instructor) and organization conducting the training (the organization may be the accredited organization itself, such as when OJT is provided);
	 Any additional information required by law or regulation.
c. Procedures for shelf-life control.	1(E)(6) For distributors, the quality control manual shall include, but not be limited to a detailed description of:
	()
	6) how shelf life-limited parts and supplies will be controlled (if applicable).
	9(A) The distributor shall have a system to adequately identify and control shelf life-limited parts and materials. Out-of-time or outdated parts and materials shall either be segregated from serviceable items, or discarded. The program shall specify a system that will assure that no expired material or part will be issued. This program includes component subassemblies containing shelf life-limited parts.
d. Procedures for handling of electrostatic sensitive devices.	1(E)(12) For distributors, the quality control manual shall include, but not be limited to a detailed description of:
	()
	12) the environmental controls used (as appropriate),
	8(E) Electro-Static Sensitive Devices: Material subject to damage from electro- static discharge shall be packaged, handled, and protected with necessary precaution and in accordance with requirements for safe handling of electro-static sensitive devices.
	8(F) Storage of Parts: The distributor quality system shall assure that serviceable parts/components are adequately protected against the environment and damage by being properly wrapped, packaged, boxed, etc., as appropriate. All fluid passages, lines, or electrical connections shall be capped or plugged. The distributor's quality system shall protect items whose performance will be adversely affected by an "unclean" environment.
e. Procedure for identifying the source from which components and material were received.	5(A) The distributor shall maintain a procurement system such that materials purchased conform to specified documentation requirements in Appendix A

	of this standard. The distributor shall have documented in its quality manual, a system which demonstrates the ability to trace the parts to the source of procurement and to the source of production, or to a FAA certificate holder. In addition, the distributor shall provide, upon request, information pertaining to the production approval status of each part.
	10(D) The distributor shall have a system documented in its quality manual which demonstrates the ability to trace the parts to the source of production or to an FAA certificate holder. In addition, the distributor shall be able to provide, upon request, information pertaining to the approval status of each part.
f. Purchasing procedures identifying documentation to accompany components and material for subsequent use by approved Part-145 maintenance organisations.	5(B) A system shall be in place to assure that special requirements are adequately communicated to the distributor's sources, so that parts conform to the customer's purchase request and that deviations are disclosed and approved by the customer.
g. Procedures for incoming inspection of components and materials.	1(E)(8) For distributors, the quality control manual shall include, but not be limited to a detailed description of:
	()
	 8) receiving inspection procedures, 6(A) Inspectors shall conduct a complete visual inspection of all incoming parts and materials. The inspection shall include, but not be limited to:
	1) a check for any obvious physical damage,
	2) verification that all appropriate plugs and caps are installed, if applicable,
	3) verification that part numbers (including dash numbers and letters), model numbers, serial numbers, lot and/or batch numbers, etc., of the items, match the accompanying documentation,
	4) verification that the quantity, part numbers or noted part number substitutes (including dash numbers and letters), model numbers, etc., of the items match the request/purchase order and agreed upon method between the aircraft operator and supplier for part number substitution,
	5) verification that all appropriate required documentation (maintenance release, material certification, traceability documents,

	etc.) are at hand, and are properly completed, and signed.
	6(B) Receiving inspection for aircraft fasteners shall include a sample visual inspection for general workmanship and presence of certifications from the manufacturer or an FAA regulated source. The distributor shall have a procedure in its quality manual for receiving and retaining Original Certified Statements when those are received.
h. Procedures for measuring equipment control that provides for appropriate storage, usage, and calibration when such equipment is required.	1(E)(9) For distributors, the quality control manual shall include, but not be limited to a detailed description of:
	()
	9) tool and test equipment calibration program (if applicable).
	7(A). If required by contract for sample inspection, test equipment shall be maintained under an effective calibration program. The distributor shall have procedures which provide for appropriate storage, usage, and calibration traceable to the National Institute of Standards and Technology for all measuring and test equipment (when applicable).
	7(B) The distributor shall have procedures to prevent tools/equipment which are past due calibration from being used. Each unit in the calibration program shall be traceable to the standard against which it was calibrated. Current documentation of calibration status shall be maintained.
i. Procedures to ensure appropriate storage conditions for components and materials that are adequate to protect the components and materials from damage and/or deterioration	1(E)(10) For distributors, the quality control manual shall include, but not be limited to a detailed description of:
in accordance with manufacturers'	()
recommendations and relevant standards.	10) the storage facilities and applicable specifications.
	3(A) Appropriate facilities shall be maintained so as to insure that storage does not damage inventory. Storage areas shall have adequate space and appropriate racks. Parts should be stored in a manner that will preclude damage.
	8(A) Material Handling: Material shall be handled in an appropriate manner and shall be protected from damage and deterioration. Special packaging shall be maintained as necessary. The storage area for aircraft parts

	chould be periodically checked for every
	should be periodically checked for overall effectiveness of storage and identification methods.
	8(F) Storage of Parts: The distributor quality system shall assure that serviceable parts/components are adequately protected against the environment and damage by being properly wrapped, packaged, boxed, etc., as appropriate. All fluid passages, lines, or electrical connections shall be capped or plugged. The distributor's quality system shall protect items whose performance will be adversely affected by an "unclean" environment.
j. Procedures for adequate packing and shipping of components and materials for granting protection from damage and deterioration, including procedures for proper shipping of dangerous goods (e.g. ICAO and ATA specifications).	8(D) Packaging: Whenever practical, materials shall be stored and delivered in the manufacturer's original packaging. Packaging shall identify the manufacturer, distributor, part number, serial number, lot or batch number (if applicable), and the quantity.
	1) The distributor shall use ATA Specification 300 packaging or equivalent, or customer specified packaging when appropriate. If practical, environmentally friendly packaging material should be utilized. Flammable, toxic, or volatile materials shall be packaged in a safe manner per manufacturer's recommendations or as specified by local regulations.
	11(A) The distributor quality system shall require components and parts to be shipped in an ATA-300 Specification container or equivalent as appropriate for the unit being shipped, or as specified by the customer. The item should be packed in the container in a manner that will preclude damage from rough handling of the container.
k. Procedure for detecting and reporting of suspected unapproved components.	6(C) Unapproved parts should be reported in accordance with Advisory Circular 21-29.
	8(J). The distributor should report suspected unapproved parts to the FAA according to AC 21-29 or to the appropriate CAA.
I. Procedure for handling of unsalvageable components in accordance with applicable regulations and standards.	1(E)(7) For distributors, the quality control manual shall include, but not be limited to a detailed description of:
	()
	7) how incoming discrepant parts and supplies will be controlled.
	8(H) Non-Conforming Materials: A closed loop system shall exist to implement corrective action following the detection of

	substandard or otherwise non-conforming parts. Rejected materials shall be identified as such and segregated from usable stock.
	1) Aircraft parts, and parts that could be reasonably assumed to be sold for aircraft use, shall be segregated from non-aircraft parts.
	8(I) Scrapped Parts: There shall be a documented procedure in place to mutilate scrapped parts by drilling, grinding, or other appropriate means. Parts shall be mutilated to the extent that will preclude the possibility of their being restored and returned to service. For additional information see FAA Order 8120.11.
	1) Records and documents shall be maintained on all serialized scrapped parts. The procedure shall identify by title or position the individual responsible for verifying that parts were adequately mutilated before discard.
	2) The distributor shall maintain a record of all life-limited parts scrapped out. The record shall contain a description of the part, its part number and serial number, if applicable, and the date the part was scrapped. The dealer shall retain this record for at least seven years.
	3) The distributor shall impose these same requirements on their subcontractors and/or repair facilities with whom they do business.
m. Procedures for batch splitting or redistribution of lots and handling of the related documents.	8(B) Batch/Lot Control: Batch segregation shall be maintained for parts so identified by the manufacturer, such as aircraft fasteners. The system shall include procedures for splitting of lots and the documentation of such splitting. Purchases, less sales, should equal inventory, which shall balance on batch/lot numbered inventories.
	10(E) The distributor shall develop a procedure for accountability when copies are made for redistribution shipments and when the approval tags are copied.
n. Procedure to notify purchasers of any components that have been shipped and later been identified to not conform to the applicable technical data or standard.	8(C) Recall Control: The distributor shall maintain records for parts identified by batch number and the quantities sold from each batch to each customer, to facilitate a manufacturer's recall notification, if required, which ensures that parts shipped can be traced and recalled.
o. Procedure for recall control to ensure that components and materials shipped can be	8(C) Recall Control: The distributor shall

traced and recalled if necessary.	maintain records for parts identified by batch
	number and the quantities sold from each batch to each customer, to facilitate a manufacturer's recall notification, if required, which ensures that parts shipped can be traced and recalled.
p. Procedure for monitoring the effectiveness of the distributor's quality system.	1(E)(14) For distributors, the quality control manual shall include, but not be limited to a detailed description of:
	()
	14) the self-audit/evaluation program which specifies an annual review.
	2(A) Self-Audit/Evaluation: The distributor shall have in place a self-audit/evaluation program to insure that the ASA-100 Standard has been implemented and that the quality system as adopted continues to meet the company's needs. The program shall provide the necessary feedback for continuous quality improvement. Self-audit/evaluations shall be conducted, at a minimum, on an annual basis. The distributor shall perform the self-audit/evaluation in accordance with written procedures or checklists that determine the effectiveness of the quality system. Audit results shall be documented, including identifying who conducted the audit, the frequency of the audit, and corrective action of non-compliance.
	1) The quality manual shall include the procedure for addressing corrective actions as well as describing the forms used to document the self-audit and corrective actions. The procedure shall include the following:
	 a) Corrective action shall be appropriate and prompt;
	 b) Corrective action shall correct the discrepancies reported;
	 c) Corrective action shall locate and correct similar discrepancies, if they exist, in areas not audited;
	 d) Corrective action shall correct the root cause of the problem evidenced by the discrepancies; and
	 e) Corrective action shall implement follow-up action(s) to assure no recurrence.

2(B) Accreditation: The distributor should contact the Aviation Suppliers Association to arrange for an independent audit. Upon notification that the distributor audit was found to be acceptable, the accredited distributor should mail or fax a
letter in accordance with FAA AC-00-56A section 10 (b). An acceptable audit result, however, does not relieve the distributor of the responsibility of maintaining a consistently acceptable quality system.

Appendix IV	Comparison Table: Point (1) of GM 145.A.42 (a) and the requirements
	of FAA AC 00-56A.

GM 145.A.42 (a)(1) quality system elements	AC 00-56A requirement
a. Availability of appropriate up to date regulations, specifications and standards.	6(g) A system for assuring that technical data, when required, is maintained in a manner that ensures such data is current and accessible.
b. Standards and procedures for training of personnel and competency assessment.	6(b) A system for training personnel to ensure that the quality system is properly executed, including the elements that make up the individual's job assignment
c. Procedures for shelf-life control.	6(f) A shelf- life control system that assures that the quality and technical criteria are met for each part stocked that is identified as having shelf life.
d. Procedures for handling of electrostatic sensitive devices.	6(j) Environmental controls to ensure parts that require special environments are identified and stored accordingly.
e. Procedure for identifying the source from which components and material were received.	6(a) Receiving inspection procedures that ensure that procured material, components, and documentation are traceable to a prior source and bear acceptable documentation that conforms to at least one of the installer's requirements listed in Appendix 1.
f. Purchasing procedures identifying documentation to accompany components and material for subsequent use by approved Part-145 maintenance organisations.	4(d) Quality System. The total network of administrative and technical data and detailed procedures required to maintain the product and parts thereof to specified airworthiness standards. In addition, refers to the distributor's total network of administrative and detailed procedures implemented to ensure that the parts sold by the distributor satisfy the customer's aviation quality requirements and, in particular, that the parts documentation accurately reflects the criteria identified in the purchase order.
	6(a) Receiving inspection procedures that ensure that procured material, components, and documentation are traceable to a prior source and bear acceptable documentation that conforms to at least one of the installer's requirements listed in Appendix 1.
g. Procedures for incoming inspection of components and materials.	6(a) Receiving inspection procedures that ensure that procured material, components, and documentation are traceable to a prior source and bear acceptable documentation that conforms to at least one of the installer's requirements listed in Appendix 1

h. Procedures for measuring equipment control that provides for appropriate storage, usage, and calibration when such equipment is required.	6(e) Measuring equipment control that provides for appropriate storage, usage, and calibration when such equipment is required
i. Procedures to ensure appropriate storage conditions for components and materials that are adequate to protect the components and materials from damage and/or deterioration in accordance with manufacturers' recommendations and relevant standards.	6(j) Environmental controls to ensure parts that require special environments are identified and stored accordingly
j. Procedures for adequate packing and shipping of components and materials for granting protection from damage and deterioration, including procedures for proper shipping of dangerous goods (e.g. ICAO and ATA specifications).	6(i) Packaging control that ensures parts shipped are adequately protected from damage and/or deterioration.
k. Procedure for detecting and reporting of suspected unapproved components.	3(a)(3) Refers to AC 21-29, Detecting and Reporting Suspected Unapproved Parts, contains guidance and information regarding the detection and reporting of suspected unapproved parts
I. Procedure for handling of unsalvageable components in accordance with applicable regulations and standards.	3(a)(4) Refers to AC 21-38, Disposition of Unsalvageable Aircraft Parts and Materials, contains guidelines for the proper disposal of unsalvageable parts and/or materials.
m. Procedures for batch splitting or redistribution of lots and handling of the related documents.	6(I) A procedure for documenting redistribution of lots. Appropriate documentation would include, but not be limited to, lot and batch control, as well as control and verification of remaining inventory. The procedures should also include control and maintenance of all documentation
n. Procedure to notify purchasers of any components that have been shipped and later been identified to not conform to the applicable technical data or standard.	6(o) A recall control system that ensures recall notification can be adequately circulated to appropriate parts that have been shipped.
o. Procedure for recall control to ensure that components and materials shipped can be traced and recalled if necessary.	6(o) A recall control system that ensures recall notification can be adequately circulated to appropriate parts that have been shipped.
p. Procedure for monitoring the effectiveness of the distributor's quality system.	6(n) A procedure for monitoring the effectiveness of the distributor's quality system, including a self-evaluation program that identifies the individual(s) within the company responsible for self-audits specifies the frequency of audits, identifies the applicable quality system standard, defines adequate records that must be created to document the audit, and describes a procedure for addressing corrective action where necessary.

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