

Disassembly Best Management Practice (BMP) for Management of Used Aircraft Parts and Assemblies

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BEST PRACTICES

ARTICLE 1 – OVERVIEW

This Best Management Practice is published and maintained by the Aircraft Fleet Recycling Association (AFRA). AFRA is a non-profit association composed of companies of common interest and focus regarding with world's older aircraft fleet. AFRA was formed by eleven charter companies in June 2006 with the mission to organize and present an industry perspective on aircraft sustainability via the development and recommendation of best practices and technologies for the management of the world's older fleet.

A specific goal identified during the Chartering activities was the commitment to complete AFRA best management practice (BMP) documents on the Management of Used Aircraft Parts and Assemblies and the Recycling of Used Aircraft Materials, Parts and Assemblies. These BMP documents were published as stand-alone documents in 2008 and 2012 respectively. Those publications met the initial AFRA obligations.

This document represents a collection of recommendations concerning best practices for the management of parts that are removed from an aircraft, engine or other asset during the disassembly of the asset at the end of its service life.

Supporting this Disassembly BMP are the following separate documents:

- *Disassembly Practice Guide and Minimum Standards.*
- *Disassembly Auditing Guidance Checklist.*

Facilities considering accreditation as a Recycler must consult these separate documents:

- *Recycling BMP*
- *Recycling Practice Guide and Minimum Standards.*
- *Recycling Auditing Guidance Checklist.*

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These documents are intended to conveniently address all of the AFRA BMP requirements, but it is not expected that all facilities will meet each separate BMP standard. AFRA Recognizes that facilities may meet one, or more than one, separate BMP standard.

This disassembly BMP is intended to guide aspects of the management of parts removed from an end-of-service aircraft asset, regardless of whether those parts are intended to be returned to commercial aircraft service. It is not intended to address disassembly that occurs incidental to maintenance (e.g. a teardown that is a step in an overhaul).

This document provides guidance by providing Best Practices, which are auditable standards.

The separate *Disassembly Practice Guide and Minimum Standards* provide guidance about how to meet these Best Practices. It contains:

- Practice Guides which 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, and
- Minimum Standards which state 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.

The separate *Disassembly Auditing Guidance Checklist* provides a means to demonstrate compliance. They show the likely locations for evidence of compliance, and are meant to be an auditing tool. Companies seeking to obtain accreditation to the BMP will be expected to assist the AFRA auditor by submitting a completed checklist with references as to where evidence of compliance for each auditing element may be found (this is provided

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prior to the audit, as directed by the Association or auditor). Companies are also advised to rely on the appropriate checklist as an element of their internal self-audit.

The separate *Disassembly Practice Guide and Minimum Standards* also contain an Appendix One called *Contracting Guidance for Disassembly Facilities*. It is a list of elements to consider when contracting for disassembly. It is not meant to represent a complete list of elements of any contract. It is not a part of the auditable standard. It is mere guidance of some of the questions to consider when forming a contract.

BMPs are voluntary standards, and AFRA imposes no legal obligation for any entity to follow the standard. For entities that choose to follow the BMPs, AFRA has developed and implemented a certification program through which AFRA audits and certifies a company's compliance to the BMP.

AFRA maintains copyright of these BMPs. AFRA also uses the name of the Association and the name of these Best Management Practices as valuable commercial marks. No person may advertise that he, she or it has been found by AFRA to be in compliance with this standard unless that person has signed an appropriate contract with AFRA and been found by AFRA to be in compliance with this standard. When a Facility is audited by AFRA for compliance to one or more of these BMPs, the Facility will be expected to comply with the appropriate BMP(s), but not the Practice Guides. The Practice Guides are offered as one way, but not the only way, to meet the requirements of the applicable BMP.

ARTICLE II – DEFINITIONS AND BMP SYSTEM REQUIREMENTS

Article II a) Definitions. For the purposes of this BMP, the following underlined terms are defined:

An **Airworthiness Event** is any event affecting an Asset, Assembly or Part that could reasonably have an adverse effect on the airworthiness of Parts from the Asset. This can include an aircraft accident, or unusual heat, stress, or environmental conditions.

An **Assembly** is a functionally integrated group of Parts that together make up a component required for the certified operation of a commercial aircraft (e.g., engines, landing gear, etc.).

The **Asset** means an item that is being disassembled, such as an aircraft, engine, or any Assembly of commercial aircraft Parts, thereof.

Best Practice means a practice that is specifically recommended by this document. It does not necessarily infer that a related regulatory mandate exists (nor that such a mandate should exist). If a Facility voluntarily chooses to comply with this Best Management Practice, then in order to remain in compliance, the Facility must follow each Best Practice found in this document as determined by the AFRA certification process.

Contracted Disassembly of an Asset, (i.e. Aircraft, Aerospace materials, and/or components) in which the contracted third party facility ensures that there is a procedure in place for evaluating and selecting the disassembly facility so as to assure the contracted firm can adequately meet the Facility's AFRA BMP Requirements.

NOTE: Facilities desiring to be accredited for Contracted Disassembly must have the auditable means to assure the Contracted Facilities are able to meet all the applicable requirements of this BMP.

Contracted Recycling of an Asset (i.e. Aircraft, Aerospace materials, and/or components) in which the Disassembly facility ensures that there is a procedure in place for evaluating and selecting a contracted recycling firm so as to assure the contracted firm can adequately meet the AFRA Recycling BMP Requirements.

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NOTE: Facilities desiring to be accredited for Contracted Recycling must have the auditable means to assure the Contracted Recycling Firms are able to meet all the applicable requirements of the Recycling BMP.

Customer: In the context of disassembly, the **Customer** means the owner of the Asset for whom the disassembly is being performed. If the Facility owns the Asset, then the Facility is also the Customer in this context.

Demolition: When used in reference to an Asset, means to destroy, smash, flatten, or demolish so as to render it totally useless from its former state.

NOTE: Facilities desiring to be accredited for Demolition must have the auditable means to perform demolition as described, at a fixed, remote or contracted area.

Disassembly: When used in reference to an Asset, means to take apart or dismantle constituent parts from a given Next Higher Assembly. It is not intended to address disassembly that occurs incidental to maintenance (e.g. a teardown that is a step in an overhaul).

NOTE: Facilities desiring to be accredited for Disassembly must have the auditable means to perform disassembly as described, at a fixed, remote or contracted area.

Discard, when used in reference to an Asset, means to dispose of the remainder of the Asset in a permissible manner – including all parts and assemblies that are not being retained as airworthy aircraft parts through the disassembly process. This can include one or more of the following: selling the remainder of the Asset to a third party in accordance with agreements with the Customer, destroying or scrapping the Asset, recycling all or a portion of the Asset, etc.

The **Facility** means the business that is seeking to comply with this BMP, for disassembly of Assets. This term is not necessarily meant to imply a geographically fixed operation; meaning that the term “Facility” may refer to a business that goes to the specific location of an Asset in order to disassemble it and the Facility may operate at more than one geographical location. The Facility is expected to comply with all laws and regulations applicable to its jurisdiction.

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A **Hidden Damage Inspection** is an inspection intended to detect hidden damage in an aircraft Asset, Assembly or Part. Such an inspection is usually performed according to methods, techniques and practices acceptable to the National Airworthiness Authority (NAA) with jurisdiction over the party performing the inspection. In many cases, the manufacturer of the Asset, Assembly or Part may be a source of acceptable Hidden Damage Inspection procedures and standards.

Material for Recycling means the materials that are offered or provided to a Recycling Facility in anticipation that they may be recycled.

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.

Part means any component, part, sub-part, assembly, sub-assembly, or other item removed from the Asset.

Where the term **Periodic** is used in this BMP, the period referenced is considered to be annual, except when specified otherwise.

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.

Procedure means a written method or practice for accomplishing a task.

A **Qualified Maintenance Provider** is a party authorized to perform a maintenance function on an aircraft Asset, Assembly or Part.

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The authorization must be issued by the National Airworthiness Authority (NAA) with jurisdiction over the provider. The authorization may be limited by ratings, operations specifications, or by any other method as directed by the NAA.

Recycled Material means the materials that are yielded by a Recycling Facility following recycling activities.

Recycling means a series of activities in which material is processed into specification- grade commodities, and consumed as raw-material feedstock, in lieu of virgin materials, in the manufacture of new products. The series of activities that make up recycling include the collection, processing and subsequent consumption of industrial, end of life and obsolete scrap, as well as the process of transforming used products, whole or in part, into reusable commodities

NOTE: Facilities desiring to be accredited for Recycling must have the auditable means to perform recycling as described, at a fixed, remote or contracted area.

An Asset, Assembly or Part is considered to be **Subject to an Airworthiness Event** from the time that the Airworthiness Event occurred until the time that a Qualified Maintenance Provider performs a Hidden Damage Inspection and verifies that the airworthiness of the Asset, Assembly or Part has not been compromised or adversely affected by the Airworthiness Event. After a Qualified Maintenance Provider performs a Hidden Damage Inspection and verifies that the airworthiness of the Asset, Assembly or Part has not been compromised or adversely affected by the Airworthiness Event, the part may be described as “Not Subject to an Airworthiness Event,” consistent with industry practice.

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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.

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.

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.

ARTICLE III - FACILITY (including infrastructure & management process)

Article III a) - Location characteristics; Identification and Compliance with Relevant Standards

BEST PRACTICE (III)(a) 1 - The Facility shall have a fixed location for disassembly, or a procedure for assuring that the location for disassembly is adequately prepared, or both.

BEST PRACTICE (III)(a) 2 - If the Facility has a fixed location for disassembly, then the Facility shall identify, and ensure compliance with, applicable environmental laws and standards.

BEST PRACTICE (III)(a) 3 - If the Facility disassembles materials at locations remote from the Facility's main location(s), then the Facility shall have one or more procedures designed to identify, and ensure compliance with, applicable environmental laws and standards.

BEST PRACTICE (III)(a) 4 - If the Facility has a fixed location for disassembly, then the Facility shall identify, and ensure compliance with, applicable occupational health and safety laws and standards.

BEST PRACTICE (III)(a) 5 - If the Facility disassembles Assets at locations remote from the Facility's main location(s), then the Facility shall have one or more procedures designed to identify, and ensure compliance with, applicable occupational health and safety laws and standards.

BEST PRACTICE (III)(a) 6 – When disassembly is contracted to a third party firm, the facility shall have a procedure for evaluating and selecting the disassembly facility so as to assure the contracted firm can adequately meet the Facility's AFRA BMP Requirements.

BEST PRACTICE (III)(a) 7 – When Recycling is contracted to a third party firm, the facility shall have a procedure for evaluating and selecting the Recycling facility so as to assure the contracted firm can adequately meet the Facility's AFRA BMP Requirements.

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Article III b) - Security

BEST PRACTICE (III)(b) 1 - The Facility shall establish a secure area in which disassembly will take place.

BEST PRACTICE (III)(b) 2 – The Facility shall establish secure areas and segregation of removed parts during the disassembly, parts tagging, and preparation for transit activities. Secure areas shall also be established for all materials identified to be recycled through the destruction process and final transport to the recycling facility

BEST PRACTICE (III)(b) 3 – The Facility shall establish procedures and infrastructure to prevent material from leaving the Facility in a manner inconsistent with the intent of the Facility.

Article III c) – Storage and Segregation of Materials

BEST PRACTICE (III)(c) 1 - A disassembly Facility shall establish a segregated Electro-Static Discharge (ESD) area for processing avionics and other equipment that may be subject to damage due to electro-static discharge.

BEST PRACTICE (III)(c) 2 - A disassembly Facility shall establish a secure, Asset-specific, staging area into which removed parts will be moved for identification and processing.

BEST PRACTICE (III)(c) 3 - A disassembly Facility shall have a procedure for identifying a secure method for moving the Asset to the location where it will be disassembled.

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.

BEST PRACTICE (III)(d) 2 - The Facility shall have a procedure for retaining documentation of periodic internal audits on how the company is

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following this Guidance, including results, and (where necessary) root-cause analysis, and corrective actions taken. Records required for the purpose of this best practice article must be kept for a period of at least two (2) years.

BEST PRACTICE (III)(d) 3 - A disassembly Facility shall have a written procedure for periodic verification of reclaimed parts and assemblies inventory through auditing controls and procedures.

BEST PRACTICE (III)(d) 4 - In the event that periodic verification shows an unexplained loss, or a failure to meet the Facility's quality expectations, the Facility shall investigate and seek an explanation for the loss or failure.

BEST PRACTICE (III)(d) 5 - Following investigation of a loss, the Facility shall develop and implement appropriate corrective action.

Article III e) – Process Flow and Process Management

BEST PRACTICE (III)(e) 1 – The Facility should have a diagram that is marked to show process and / or material flow through the Facility.

ARTICLE IV – TRAINING

BEST PRACTICE (IV)(a) 1 – The Facility shall prepare training records to document the way that it has met its training requirements.

BEST PRACTICE (IV)(a) 2 – A disassembly Facility shall ensure that it has personnel to perform the disassembly who have been trained in relation to the disassembly information from the manufacturer’s technical manuals.

BEST PRACTICE (IV)(a) 3 – A disassembly Facility shall ensure that the disassembly personnel have received appropriate training related to the functions they perform.

ARTICLE V – DOCUMENTATION & RECORDS

Article V a) – Asset and Transaction Records

BEST PRACTICE (V)(a) 1 – A disassembly Facility shall have a procedure for identifying, collecting and reviewing the appropriate records related to the Asset.

BEST PRACTICE (V)(a) 2 – A disassembly Facility shall have or prepare a manifest of parts expected to be removed from the Asset.

BEST PRACTICE (V)(a) 3 – A disassembly Facility shall have a clear, written understanding of any customer expectations or demands concerning disassembly of the Asset and recovery of the parts removed.

BEST PRACTICE (V)(a) 4 - A disassembly Facility shall have a clear, written understanding of how the Asset is to be discarded following disassembly.

Article V b) – Reference Manuals

BEST PRACTICE (V)(b) 1 – A disassembly Facility shall use appropriate methods for removing parts from the Asset, such as those recommended in the manual published by the manufacturer of the Asset, or other guidance that provides adequate protections equivalent to the manufacturer's manuals.

Article V c) – Tagging in a Disassembly Operation

BEST PRACTICE (V)(c) 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.

BEST PRACTICE (V)(c) 2 – If a disassembly Facility chooses to issue an approval for return to service tag in addition to a disassembly tag then the Facility must confirm that it has appropriate certificated privileges permitting such an approval, and that it

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uses methods, techniques or practices for accomplishing the inspections that are acceptable to the appropriate government authority.

Article V d) – Parts

BEST PRACTICE (V)(d) 1 – A disassembly Facility shall maintain a record of each part removed from the Asset.

BEST PRACTICE (V)(d) 2 – Following disassembly, the records associated with the Asset shall be returned to the Customer or handled according to the Agreement between the disassembly Facility and the Customer.

ARTICLE VI – TOOLING

BEST PRACTICE (VI) 1 – The Facility shall ensure that it has and uses the appropriate tooling, equipment and / or machinery for the disassembly functions it performs.

BEST PRACTICE (VI) 2 – Tooling, equipment and machinery should be maintained, calibrated and tested according to the manufacturer’s recommendations, so long as those recommendations are appropriate to the usage at the facility. Where there are no manufacturer’s recommendations for maintenance, calibration and testing, or where the manufacturer’s recommendations are inappropriate for the Facility, the Facility should develop its own procedures for maintenance, calibration and testing.

ARTICLE VII – PARTS AND MATERIALS MANAGEMENT DURING PROCESSING

Article VII a) – Screening, Tagging and Staging during Asset Disassembly

BEST PRACTICE (VII)(a) 1 – During or following disassembly, removed parts should be prepared for safe storage and/or transportation.

BEST PRACTICE (VII)(a) 2 – Once a part has entered the segregated staging area, the Facility shall have a written procedure for analyzing it to make sure it meets the Customer's requirements and to make sure it is on the Customer's manifest. Parts that do not meet appropriate standards must be returned to the Asset disassembly area or a quarantine area to be held until they are ready to be researched (if the problem can be overcome through research), recycled or otherwise dispositioned.

BEST PRACTICE (VII)(a) 3 – The Facility must not determine the airworthiness of parts unless the Facility is properly authorized to do this.

BEST PRACTICE (VII)(a) 4 – When identifying parts as unsalvageable, the Facility shall identify the reason for this identification.

Article VII b) – Containerization

BEST PRACTICE (VII)(b) 1 – The Facility shall ensure that it has appropriate storing and shipping containment and packing materials for the articles or materials that it handles.

Article VII c) – Shipping

BEST PRACTICE (VII)(c) 1 – The agreement with the Customer may specify that the Customer is responsible for shipping or transportation issues, in which case the Customer's procedures, and not the Facility's procedures, shall be used.

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BEST PRACTICE (VII)(c) 2 – The Facility shall ensure that materials it ships or transports are packaged and shipped appropriately in accordance with acceptable standards, including contractual requirements.

BEST PRACTICE (VII)(c) 3 – The Facility shall have a procedure for assuring its own compliance with dangerous goods regulations.

BEST PRACTICE (VII)(c) 4 – The Facility shall have a procedure for assuring its own compliance with import and export regulations.

ARTICLE VIII – ENVIRONMENTAL PROTECTION

BEST PRACTICE (VIII) 1 – The area and methodology for disassembly should adequately protect the environment from unanticipated releases of fluids and hazardous materials that are used during the processing or that might escape from the Asset during disassembly. This should include a Pre-disassembly Checklist to assure compliance.

BEST PRACTICE (VIII) 2 – If the Asset or the Materials contain fluids then the fluids must be drained, managed and disposed of according to local jurisdictional requirements.

BEST PRACTICE (VIII) 3 – The disassembly facility shall have a procedure for evaluating and selecting a recycling Facility that can adequately meet the Facility's recycling goals.

BEST PRACTICE (VIII) 4 – The disassembly facility shall coordinate with the recycler to ensure that parts intended for recycling are processed in a manner that supports the recycling goals of the Facility.

BEST PRACTICE (VIII) 5 – The disassembly facility shall have a procedure for verifying that the recycling facility fully implements the recycling agreement between the recycling facility and the disassembly facility and/or Customer.

ARTICLE IX – ACCOUNTABILITY TO THE CUSTOMER

BEST PRACTICE (IX) 1 – Where verification is required by the Customer, supplier or source, the Facility shall have a procedure for verifying to each Customer or supplier of Materials, or each Asset owner or source, that the Facility fully implements each element of the agreement between the Facility and the Customer, supplier or source.

ARTICLE X – SCRAPPING

BEST PRACTICE (X) 1 – Where aircraft parts are specifically identified by the Facility or the Customer to be precluded from re-entry into the civil aviation marketplace, the facility shall have procedures to address the handling of such parts.

BEST PRACTICE (X) 2 – The parts shall be precluded from re-entry into the civil aviation marketplace by rendering those parts unusable for their original intent.

BEST PRACTICE (X) 3 – Until such time that the identified parts are rendered unusable, the identified parts shall be segregated from other parts.

BEST PRACTICE (X) 4 – For parts that have already been tagged (per Article V (c)), and/or are on the Manifest, the facility shall have a procedure and methods for accountability regarding the records created to list and attest that the identified parts have been rendered unusable. If the actions to render the parts unusable have been contracted to an outside contractor, the procedure shall include the methods used for accountability and recording the rendering actions.

APPENDIX ONE: Best Practice Contracting Guidance for 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.

- 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?
- What is the location for disassembly? Who is responsible for moving the aircraft to the place where it will be disassembled? Who is responsible for the associated costs?
- Who owns the parts? Who owns the fuselage or other remainders once disassembly is complete? Does the disassembler have any right to salvage of the remainder? Who is responsible for disposing of remainder?
- Payment for services? Who is responsible for taxes? What are the terms of payment? What if the customer believes that the work has not been completed – what remedies and procedures apply?
- Who is responsible for delays or failures to perform due to acts of God or other events.
- Does either side indemnify the other for certain types of liabilities?

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- Who is responsible for identifying the need for, obtaining, and paying for insurance.
- Owner should warrant that he has the legal authority to give permission for the disassembly
- What parts are to be removed? What is the procedure for amending that list?
- What is the schedule for disassembly? What deadlines apply? Are there penalties for late completion or bonuses for early completion?
- How will contract disputes be resolved? Is there a set process? What law applies to the resolution of disputes? Where must disputes be resolved?
- Who is responsible for health and safety risk and compliance issues?
- Who is responsible for protection and security of asset/location and how will this be accomplished
- Who is responsible for insurance?
- Can either party assign its rights or obligations under the agreement? Are there conditions for assignment of rights or obligations?
- Liability for removal damage – identification of removal damage v. pre- removal damage?
- Who will supply facilities for disassembly? Tooling for disassembly? Stands, jacks, dropkits, etc. Special tooling? Manuals, instructions and other data?
- Who will supply documentation on the aircraft to support traceability?

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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