

# Disassembly Audit Guidance Checklist

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## Aircraft Fleet Recycling Association

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### Revision 4.0

#### REVISION HISTORY

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4.0	1 July 2018	Complete re-write and reformatted from rev 3.3	AFRA BMP Development Committee

**Title Page**

# Disassembly Audit Guidance Checklist

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# Disassembly Audit Guidance Checklist

## AFRA BMP Disassembly Checklist

### COVERSHEET

**Audit Type:**         Accreditation Audit  
                           Surveillance Audit  
                           Re-Accreditation Audit  
                           Special Audit  
                           Internal Audit

<b>Company Name:</b>					
<b>Address:</b>					
<b>City:</b>		<b>State:</b>		<b>Zip Code:</b>	
<b>Country:</b>		<b>Phone:</b>		<b>Date of Audit:</b>	
<b>Email:</b>		<b>Fax:</b>		<b>Years in Business:</b>	
<b>Date of last audit to this BMP: (If first, print "FIRST")</b>				<b>Number of Employees:</b>	
<b>Date this BMP was adopted:</b>					

Name of Person Responsible for the quality at the above location:

\_\_\_\_\_

Print Name
Signature
Date

Auditor Information:

\_\_\_\_\_

Print Name
Signature
Date

Applicability Codes: For a given Best Practice citation, these codes denote the area within the system that the Best Practice mostly applies to. The codes are:

- M     =     Manual
- F     =     Facility
- I     =     Inventory
- A     =     Audit Records
- T     =     Tooling Records
- TR    =     Training Records
- W     =     Work Package
- C     =     Contract Review (Pull contracts for the reviewed Work Package)

## Disassembly Audit Guidance Checklist

<b>BEST PRACTICE REFERENCE</b>	<b>APPLICABILITY</b>	<b>AUDITOR TASK</b>	<b>PROCEDURE/ OTHER REFS/ COMMENTS</b>
<b>BMP SYSTEM REQUIREMENTS</b>			
<b>BEST PRACTICE (II)(b) 1</b> - Each accredited company shall have a BMP Manual.	M	Identify that there is a BMP Manual	
<b>BEST PRACTICE (II)(b) 2</b> - The BMP Manual is made up of all of the Procedures reflecting the company's compliance with this BMP.	M	Identify whether the Manual contains all the Procedures required by the BMP to be in compliance with the standard	
<b>BEST PRACTICE (II)(b) 3</b> - 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.	M	All procedures which have applicability to demonstrate compliance with the BMP are unambiguously labeled or referenced as such.	
<b>BEST PRACTICE (II)(b) 4</b> - 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.	M	Identify that there is a demonstrable means for tracking changes and revisions.	

## Disassembly Audit Guidance Checklist

BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
<b>FACILITY/ LOCATION CHARACTERISTICS; IDENTIFICATION AND COMPLIANCE WITH RELEVANT STANDARDS</b>			
<b>BEST PRACTICE (III)(a) 1</b> - The Facility shall have a fixed location for disassembly, or a procedure for assuring that the location for disassembly is adequately prepared, or both.	M	Identify whether there is a fixed location, remote location(s), or both.	
<b>BEST PRACTICE (III)(a) 2</b> - If the Facility has a fixed location for disassembly, then the Facility shall identify, and ensure compliance with, applicable environmental laws and standards.	M	Identify compliance procedures or list of applicable laws; identify responsible party.	
	A	Review the audit records; confirm that facility is ensuring compliance.	
<b>BEST PRACTICE (III)(a) 3</b> - 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 environmental laws and standards.	M	Identify compliance procedures; identify responsible party.	
	A	Review the audit records; confirm that compliance is ensured at remote locations	
<b>BEST PRACTICE (III)(a) 4</b> - 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.	M	Identify compliance procedures or list of applicable laws; identify responsible party.	
	A	Review the audit records; confirm that facility is ensuring compliance	



## Disassembly Audit Guidance Checklist

SECURITY			
<p><b>BEST PRACTICE (III)(b) 1 -</b> The Facility shall establish a secure area in which disassembly will take place.</p>	M	<p>Identify the description of how security will be maintained at the time of disassembly; this may be N/A if there is permanent physical security evident at the time of the Facility Inspection.</p>	
	F	<p>Identify the area if a disassembly is taking place or if there is a permanent area</p>	

## Disassembly Audit Guidance Checklist

<b>BEST PRACTICE REFERENCE</b>	<b>APPLICABILITY</b>	<b>AUDITOR TASK</b>	<b>PROCEDURE/ OTHER REFS/ COMMENTS</b>
<b>BEST PRACTICE (III)(b) 2 –</b> 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.	M	Identify the description of how security will be maintained at the time of disassembly; this may be N/A if there is permanent physical security evident at the time of the Facility Inspection.	
	F	Identify the area if a disassembly is taking place or if there is a permanent area	
<b>BEST PRACTICE (III)(b) 3 –</b> The Facility shall establish procedures and infrastructure to prevent material from leaving the Facility in a manner inconsistent with the intent of the Facility.	M	Identify that the Manual has a procedure for controlling the dispatch or disposal of material	
<b>STORAGE AND SEGREGATION OF MATERIALS</b>			
<b>BEST PRACTICE (III)(c) 1 - A</b> 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.	M	Identify the ESD area from a work area map or procedure; this may be N/A if there is permanent ESD area evident at the time of the Facility Inspection.	
	F	Identify the area if a disassembly is taking place or if there is a permanent area	





## Disassembly Audit Guidance Checklist

<b>BEST PRACTICE REFERENCE</b>	<b>APPLICABILITY</b>	<b>AUDITOR TASK</b>	<b>PROCEDURE/ OTHER REFS/ COMMENTS</b>
<p><b>BEST PRACTICE (III)(d) 2</b> - The Facility shall have a procedure for retaining documentation of periodic internal audits on how the company is 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.</p>	<p style="text-align: center;">M</p> <p style="text-align: center;">A</p>	<p>Identify the procedure</p> <p>Verify records for past two years are kept (for new BMP accreditees, there should be at least one self audit prior to the audit and in the second year, records should date back at least one year)</p>	
<p><b>BEST PRACTICE (III)(d) 3</b> - A disassembly Facility shall have a written procedure for periodic verification of reclaimed parts and assemblies inventory through auditing controls and procedures.</p>	<p style="text-align: center;">M</p>	<p>Identify the procedure</p>	
<p><b>BEST PRACTICE (III)(d) 4</b> - 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.</p>	<p style="text-align: center;">A</p>	<p>If audit records show an unexplained loss, then verify investigation and root cause records</p>	
<p><b>BEST PRACTICE (III)(d) 5</b> - Following investigation of a loss, the Facility shall develop and implement appropriate corrective action.</p>	<p style="text-align: center;">A</p>	<p>If audit records show an unexplained loss, then verify corrective action records</p>	

## Disassembly Audit Guidance Checklist

BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
<b>PROCESS FLOW AND PROCESS MANAGEMENT</b>			
<b>BEST PRACTICE (III)(e) 1</b> – The Facility should have a diagram that is marked to show process and / or material flow through the Facility.	M	Check the manual or other printed media for the diagram	
<b>TRAINING</b>			
<b>BEST PRACTICE (IV)(a) 1</b> – The Facility shall prepare training records to document the way that it has met its training requirements.	M	Identify the procedure.	
	TR	Examine representative records to confirm compliance.	
<b>BEST PRACTICE (IV)(a) 2</b> – 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.	M	Identify training procedures in order to be able to verify compliance with these procedures during review of the training records.	
	TR	Examine representative records to confirm compliance; confirm training in either how to use manuals or in specific applicable manual provisions	







## Disassembly Audit Guidance Checklist

BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
<b>REFERENCE MATERIALS</b>			
<b>BEST PRACTICE (V)(b) 1</b> – 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.	M	Identify a procedure meeting this requirement; if there is no procedure then make a note to confirm that the issue is addressed in the representative work packages.	
	W	Review representative work package(s) to confirm compliance; also check parts identified during inventory phase	
<b>TAGGING IN A DISASSEMBLY OPERATION</b>			
<b>BEST PRACTICE (V)(c) 1</b> – 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.	M	Identify a procedure for the completion of tags meeting this requirement; if there is no procedure then make a note to confirm that the issue is addressed in the representative work packages or through examination of inventory.	
	I	Examine representative parts from inventory to assure they are properly tagged	





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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
<b>PARTS</b>			
<b>BEST PRACTICE (V)(d) 1</b> – A disassembly Facility shall maintain a record of each part removed from the Asset.	I	Spot check parts and make notes to reference against manifest during the work package review phase.	
	W	Review representative work package(s) to confirm compliance	
<b>BEST PRACTICE (V)(d) 2</b> – 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.	M	Identify a procedure supporting this requirement; if there is no procedure then make a note to confirm that the issue is addressed in the representative work packages.	
	W	Review representative work package(s) to confirm compliance through records verifying transfer of documents	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
<b>TOOLING</b>			
<b>BEST PRACTICE (VI) 1</b> – The Facility shall ensure that it has and uses the appropriate tooling, equipment and / or machinery for the disassembly functions it performs.	M	Identify a procedure supporting this requirement; if there is no procedure then make a note to confirm that the standard is met in tooling review.	
	F	If tooling is present, then spot-check to ensure it is appropriate; make a note of representative tooling for reference during tooling record review	
<b>BEST PRACTICE (VI) 2</b> – 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.	M	Identify a procedure supporting this requirement; if there is no procedure then make a note to confirm that the standard is met in tooling review.	
	T	Spot-check tooling maintenance / calibration records	

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<b>BEST PRACTICE REFERENCE</b>	<b>APPLICABILITY</b>	<b>AUDITOR TASK</b>	<b>PROCEDURE/ OTHER REFS/ COMMENTS</b>
<b>PARTS AND MATERIALS MANAGEMENT DURING PROCESSING/SCREENING, TAGGING AND STAGING DURING ASSET DISASSEMBLY</b>			
<b>BEST PRACTICE (VII)(a) 1 –</b> During or following disassembly, removed parts should be prepared for safe storage and/or transportation.	M	Identify preparation and packaging procedures; make a note of those procedures for later inventory review.	
	I	Spot check parts to confirm preparation protocols are met	
<b>BEST PRACTICE (VII)(a) 2 –</b> 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.	M	Identify procedure.	
	I	Spot check parts in segregated staging area and quarantine to confirm compliance	



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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
<b>CONTAINERIZATION</b>			
<b>BEST PRACTICE (VII)(b) 1</b> – The Facility shall ensure that it has appropriate storing and shipping containment and packing materials for the articles or materials that it handles.	M	Identify relevant procedures and make note to check during facility review	
	F	Spot-check packing materials for presence and compliance to manual	
<b>SHIPPING</b>			
<b>BEST PRACTICE (VII)(c) 1</b> – 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.	C	Review representative contract; if this is the case then check actual work package records to see if customer’s guidelines were followed	
<b>BEST PRACTICE (VII)(c) 2</b> – The Facility shall ensure that materials it ships or transports are packaged and shipped appropriately in accordance with acceptable standards, including contractual requirements.	M	Identify relevant procedures and make note to check during facility review.	
	F	Spot-check packing materials for presence and compliance to acceptable standards.	

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<b>BEST PRACTICE REFERENCE</b>	<b>APPLICABILITY</b>	<b>AUDITOR TASK</b>	<b>PROCEDURE/ OTHER REFS/ COMMENTS</b>
<p><b>BEST PRACTICE (VII)(c) 3 –</b> The Facility shall have a procedure for assuring its own compliance with dangerous goods regulations.</p>	<p>M</p> <p>TR</p> <p>W</p>	<p>Identify procedures.</p> <p>Confirm that there is at least one hazmat employee with appropriate training; or an alternative procedure for use of a trained contractor.</p> <p>Confirm compliance with manual procedures through review of representative shipping records if any hazmat has been shipped in relation to the work package(s)</p>	
<p><b>BEST PRACTICE (VII)(c) 4 –</b> The Facility shall have a procedure for assuring its own compliance with import and export regulations.</p>	<p>M</p> <p>W</p>	<p>Identify procedure.</p> <p>Confirm compliance with manual procedures through review of representative shipping records if any exports or imports have been undertaken in relation to the work package(s)</p>	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
<b>ENVIRONMENTAL PROTECTION</b>			
<b>BEST PRACTICE (VIII) 1</b> – 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.	M	Identify procedures addressing the following: <ul style="list-style-type: none"> <li>• Receiving inspection specific to fuels, liquids and lavatories</li> <li>• Having right equipment to drain plane</li> <li>• Having spill equipment and spill prevention &amp; management plan in place in event of unexpected release</li> <li>• Having a Pre-Disassembly checklist.</li> </ul>	
	F	Examine facility to assure compliance with procedures	





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<b>BEST PRACTICE (VIII) 4</b> – 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.	M	Identify evaluation procedure.	
	C	Examine recycler contract – confirm it meets the procedure for coordination from the manual	
<b>BEST PRACTICE (VIII) 5</b> – 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.	M	Identify procedure for verification (e.g. audit procedure).	
	A	Check recycling verification audit records	
<b>ACCOUNTABILITY TO THE CUSTOMER</b>			
<b>BEST PRACTICE (IX) 1</b> – 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.	M	Identify Procedure.	
	C	Examine Customer contract for evidence that they require verification, and if so, is the facility in compliance with the manual’s written procedure and Customer requirement.	

## Disassembly Audit Guidance Checklist

BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
<b>SCRAPPING</b>			
<b>BEST PRACTICE (X) 1</b> – 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.	M	Identify the procedure	
<b>BEST PRACTICE (X) 2</b> – The parts shall be precluded from re-entry into the civil aviation marketplace by rendering those parts unusable for their original intent.	F	From either records or material in process, check that the specific rendering process has been documented.	
<b>BEST PRACTICE (X) 3</b> – Until such time that the identified parts are rendered unusable, the identified parts shall be segregated from other parts.	I  F	If in process, check affected inventory for segregation.  Check facility for provisions to segregate parts as reflected in the procedure	
<b>BEST PRACTICE (X) 4</b> – 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.	C	Review contracts, and if such scrapping was included, check for records of compliance.	