

Recycling Audit Guidance Checklist

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Title Page

Recycling Audit Guidance Checklist

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Recycling Audit Guidance Checklist

AFRA BMP Recycling Checklist

COVERSHEET

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

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

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
- S = Shipping
- C = Contract Review (Pull contracts for the reviewed Work Package)

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

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
FACILITY/ LOCATION CHARACTERISTICS; IDENTIFICATION AND COMPLIANCE WITH RELEVANT STANDARDS			
BEST PRACTICE (III)(a) 1 - The Facility shall have a fixed location for recycling, or a procedure for assuring that the location for recycling is adequately prepared, or both.	M	Identify whether there is a fixed location, remote location(s), or both.	
BEST PRACTICE (III)(a) 2 - If the Facility has a fixed location for recycling, 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.	
	F	Verify facility has ensured compliance with the identified standards.	
	A	Review the audit records; confirm that facility is ensuring compliance.	
	TR	Examine representative records to confirm compliance; confirm training	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
<p>BEST PRACTICE (III)(a) 3 - If the Facility recycles 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.</p>	<p>M</p> <p>F</p> <p>A</p>	<p>Identify compliance procedures; identify responsible party.</p> <p>Verify facility has ensured compliance with the identified standards.</p> <p>Review the audit records; confirm that compliance is ensured at remote locations.</p>	
<p>BEST PRACTICE (III)(a) 4 - If the Facility has a fixed location for recycling, then the Facility shall identify, and ensure compliance with, applicable occupational health and safety laws and standards.</p>	<p>M</p> <p>A</p>	<p>Identify compliance procedures or list of applicable laws; identify responsible party.</p> <p>Review the audit records; confirm that facility is ensuring compliance.</p>	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
BEST PRACTICE (III)(a) 5 - If the Facility recycles 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 occupational health and safety laws and standards.	M	Identify compliance procedures; identify responsible party.	
	A	Review the audit records; confirm that compliance is ensured at remote locations.	
	TR	Examine representative records to confirm compliance; confirm training	
SECURITY			
BEST PRACTICE (III)(b) 1 - The Facility shall establish a secure area in which recycling will take place.	M	Identify the description of how security will be maintained.	
	F	Identify the area.	
BEST PRACTICE (III)(b) 2 - 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 procedure for controlling disposal of material.	
	F	Verify facility compliance with identified procedures.	
	C	Review representative contract(s) to assure compliance.	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
<p>BEST PRACTICE (III)(b) 3 – The Facility shall establish procedures and infrastructure to prevent unwanted material from entering the Facility.</p>	M	Identify procedure for excluding undesired material; identify procedure for informing customers/suppliers about limits on materials.	
	F	Verify facility compliance with identified procedures.	
	I	Spot-check inventory to verify compliance with procedures	
STORAGE AND SEGREGATION OF MATERIALS			
<p>BEST PRACTICE (III)(c) 1 – The Facility shall have a process for material control, which meets the following standards:</p> <p>(i) ensures that Recycled Material is segregated (by material) according to commercially reasonable standards or standards defined in a customer contract;</p> <p>(ii) effectively segregates all Recycled Material that are intended to be transferred as aerospace materials, or as having been derived from an aviation or aerospace source, from those that are not intended to be described in this way;</p> <p>(iii) documents the segregation mechanisms.</p>	M	Identify description of segregation protocols; identify map designating respective segregated areas.	
	F	Identify the areas if a disassembly is taking place or if there are permanent areas; verify compliance with identified procedures.	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
BEST PRACTICE (III)(c) 2 – When a specific customer provides written requirements that their materials be segregated from other materials, the Facility shall have a procedure for ensuring that these customer segregation requirements are followed.	M	Identify the procedure for ensuring segregation; identify procedures for maintaining segregation throughout process; identify security procedures.	
	F	Identify the area if a disassembly is taking place or if there is a permanent area.	
	C	Review representative contract(s) to assure compliance with customer segregation requirements	
INVENTORY ACCOUNTING & AUDITS			
BEST PRACTICE (III)(d) 1 - The Facility shall have a procedure for periodic internal audits to the BMP Checklist.	M	Identify the procedure.	
	A	Review the audit records; identify particular areas of concern.	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
<p>BEST PRACTICE (III)(d) 2 - 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>M</p> <p>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>BEST PRACTICE (III)(d) 3 - A recycling Facility shall have a procedure for periodic verification of quality of recycled materials through auditing controls and procedures.</p>	<p>M</p> <p>A</p>	<p>Identify the procedure.</p> <p>Review the audit records; confirm that facility is ensuring compliance and quality control.</p>	
<p>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.</p>	<p>M</p> <p>A</p>	<p>Identify the procedure.</p> <p>If audit records show an unexplained loss, then identify result of investigation or explanation for loss.</p>	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
BEST PRACTICE (III)(d) 5 - Following investigation of a loss, the Facility shall develop and implement appropriate corrective action.	M	Identify the procedure; may not be applicable if no corrective action has been necessary.	
	A	If audit records show an unexplained loss, then verify corrective action records.	
BEST PRACTICE (III)(d) 6 – A recycling Facility shall have a procedure for periodic verification of quantity of recycled materials through auditing controls and procedures.	M	Identify the procedure.	
	A	If audit records show an unexplained loss, then verify investigation and root cause records.	
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.	M	Identify the diagram.	
	F	Verify compliance with diagram.	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
EXTERNAL TRANSPORTATION OF MATERIALS			
BEST PRACTICE (III)(f) 1 – When the Facility is responsible for moving Customer Materials for Recycling, then the Facility shall have a procedure for identifying a secure method for moving the Customer materials and reporting the shipped material details to the Customer.	M	Identify the procedures.	
	A	Review the audit records; confirm that facility is ensuring compliance.	
	S	Verify secure method for moving materials and reporting shipped material details to customer.	
	C	Review representative contract(s) to assure compliance.	
BEST PRACTICE (III)(f) 2 – When the Facility is responsible for moving Customer Recycled Materials, then the Facility shall have a procedure for identifying a secure method for moving the Customer materials and reporting the shipped material details to the Customer.	M	Identify the procedures.	
	S	Verify secure method for moving materials and reporting shipped material details to customer.	
	C	Review representative contract(s) to assure compliance.	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
TRAINING			
BEST PRACTICE (IV)(a) 1 – The Facility shall prepare training records to document the way that it has met its training requirements.	M	Examine representative records.	
	TR	Examine representative records to confirm compliance; confirm training in either how to use manuals or in specific applicable manual provisions	
BEST PRACTICE (IV)(a) 2 – A recycling Facility shall ensure that the recycling personnel have received appropriate training related to the functions they perform, including but not limited to use of equipment and machinery and materials identification techniques.	M	Identify training procedures in order to be able to verify compliance with these procedures during review of the training records.	
DOCUMENTATION & RECORDS/MATERIAL AND TRANSACTION RECORDS			
BEST PRACTICE (V)(a) 1 – A recycling Facility shall have a procedure for identifying, collecting and reviewing the appropriate records related to the Materials for Recycling.	M	Identify the procedure.	
	TR	Examine representative records to confirm compliance; confirm employees have received job-specific training.	
	W	Examine representative work package to make sure records are actually collected.	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
BEST PRACTICE (V)(a) 2 – A recycling Facility shall have or prepare a receiving document describing each arriving Materials for Recycling, and shall have a procedure for the acquisition and/or preparation of such records.	M	Identify a procedure meeting this requirement; if there is no procedure then make a note to confirm that the issue is addressed as a contracting norm.	
	W	Review representative work package(s) to assure creation of manifest(s).	
	C	Review representative contract(s) to assure reference to manifest(s).	
BEST PRACTICE (V)(a) 3 – A recycling Facility shall have a clear, written understanding of any customer expectations or demands concerning handling of Materials for Recycling that belong to a Customer.	M	Identify a procedure meeting this requirement; if there is no procedure then make a note to confirm that the issue is addressed as a contracting norm.	
	W	Review representative work package(s) to assure that work performed matches written customer expectations.	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
<p>BEST PRACTICE (V)(a) 4 – If a recycling Facility does not own the Materials for recycling, then the Facility shall have a clear, written understanding of how the Recycled Materials are to be dispositioned following recycling.</p>	M	Identify a procedure meeting this requirement; if there is no procedure then make a note to confirm that the issue is addressed as a contracting norm.	
	W	Review representative work package(s) to assure that work performed matches written customer expectations.	
	C	Review representative contract(s) to assure compliance.	
<p>BEST PRACTICE (V)(a) 5 – A recycling Facility shall have or prepare an output document describing each lot of Recycled Materials, and shall have a procedure for the preparation of such output documents.</p>	M	Identify the procedure.	
	W	Examine representative work package to ensure output documents are created.	
	C	Review representative contract(s) to assure compliance.	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
REFERENCE MATERIALS			
BEST PRACTICE (V)(b) 1 – A recycling Facility shall maintain appropriate reference manuals as aids in identifying materials and their physical properties. The Facility shall maintain appropriate customer specifications as aids in processing materials.	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	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
TOOLING			
BEST PRACTICE (VI) 1 – The Facility shall ensure that it has and uses the appropriate tooling, equipment and / or machinery for the recycling 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.	
	T	Spot-check tooling maintenance / calibration records.	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
<p>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.</p>	<p>M</p> <p>F</p> <p>T</p>	<p>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.</p> <p>If tooling is present, then spot-check to ensure it is appropriate; make a note of representative tooling for reference during tooling record review; verify facility compliance with identified procedures.</p> <p>Spot-check tooling maintenance / calibration records.</p>	

Recycling Audit Guidance Checklist

BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
PARTS AND MATERIALS MANAGEMENT DURING PROCESSING/RECEIVING INSPECTION FOR MATERIALS FOR RECYCLING			
BEST PRACTICE (VII)(a) 1 – Incoming Materials for Recycling should be checked to ascertain whether they contain unexpected hazards.	M	Identify the procedure.	
	F	Identify the area if a disassembly is taking place or if there is a permanent area; verify compliance with identified procedures.	
	I	Spot-check inventory to verify compliance with procedures.	
BEST PRACTICE (VII)(a) 2 – Incoming Materials for Recycling should be checked to assure they meet the documented identification.	M	Identify the procedure.	
	F	Identify the area if a disassembly is taking place or if there is a permanent area; verify compliance with identified procedures.	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
BEST PRACTICE (VII)(a) 3 – After Receiving Inspection, Incoming Materials for Recycling being received should be identified and segregated.	M	Identify the procedure; make note of procedure for later inventory review.	
	F	Identify the areas if a disassembly is taking place or if there are permanent areas; verify compliance with identified procedures.	
	I	Spot-check inventory in identified areas.	
SEGREGATION DURING RECYCLING STAGES			
BEST PRACTICE (VII)(b) 1 – The recycling facility should have a procedure for segregating materials during the various stages of recycling.	M	Identify the procedures; make a note of those procedures for later inventory review.	
	F	Identify the areas if a disassembly is taking place or if there are permanent areas; verify compliance with identified procedures.	
	I	Spot-check inventory at various stages of recycling to verify compliance with identified procedures.	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
CONTAINERIZATION			
BEST PRACTICE (VII)(c) 1 – 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 verify during facility review.	
	F	Spot-check packing materials for presence and compliance to identified procedures.	
	I	Verify identified areas are appropriate for storing.	
	S	Spot check facility for appropriate storage and shipping containment	
SHIPPING			
BEST PRACTICE (VII)(d) 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.	C	Review representative contract; if this is the case then check actual work package records to see if customer's guidelines were followed.	
	S	Review representative contract; if this is the case then verify facility's ability to comply with customer requirements.	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
<p>BEST PRACTICE (VII)(d) 2 – The Facility shall ensure that materials it ships or transports are packaged and shipped appropriately in accordance with acceptable standards, including contractual requirements.</p>	<p>M</p> <p>F</p> <p>W</p> <p>C</p> <p>S</p>	<p>Identify relevant procedures and make note to check during facility and shipping review.</p> <p>Spot-check packing materials for presence and compliance to acceptable standards.</p> <p>Review representative work package(s) to assure that shipping is in accordance with acceptable standards; verify compliance with identified contractual requirements.</p> <p>Review representative contract(s) to assure compliance with customer requirements.</p> <p>Spot check pending shipments to verify compliance</p>	

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

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
<p>BEST PRACTICE (VII)(d) 4 – The Facility shall have a procedure for assuring its own compliance with import and export regulations.</p>	<p style="text-align: center;">M</p> <p style="text-align: center;">W</p> <p style="text-align: center;">S</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> <p>Verify implementation of, and compliance with, the identified procedures.</p>	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
ENVIRONMENTAL PROTECTION			
BEST PRACTICE (VIII) 1 – The area and methodology for recycling 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 recycling.	M	Identify procedures addressing the following: <ul style="list-style-type: none"> • Receiving inspection specific to fuels, liquids and lavatories. • Having appropriate equipment to drain liquid-filled Materials for Recycling. • Having spill equipment and spill prevention & management plan in place in event of unexpected release. 	
	F	Examine facility to assure: <ul style="list-style-type: none"> - Receiving inspection specific to fluids and lavatories. - Appropriate equipment to drain liquid-filled Materials for Recycling - Spill equipment and spill prevention and management plan in place. 	
	I	Spot check parts in storage to confirm compliance; spot-check parts in processing to confirm compliance.	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
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 for Recycling, 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 for verification (e.g. audit procedure).	
	I	Spot check inventory for compliance with customer requirements.	
	A	Check recycling verification audit records.	
	W	Review representative work package(s) to assure that work performed matches written customer expectations and is verified to customer.	
	C	Examine recycler contract – confirm it meets the identified procedure for coordination and implementation.	

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BEST PRACTICE REFERENCE	APPLICABILITY	AUDITOR TASK	PROCEDURE/ OTHER REFS/ COMMENTS
SCRAPPING			
BEST PRACTICE (X) 1 – When aircraft parts and/or material are specifically identified by 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	
BEST PRACTICE (X) 2 – The parts and/or material 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.	
BEST PRACTICE (X) 3 – Until such time that the identified parts and/ or material 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 or material as reflected in the procedure	
BEST PRACTICE (X) 4 – The facility shall have a procedure and methods for accountability regarding the records created to list and attest that the identified parts and/or material have been rendered unusable.	C	Review contracts, and if such scrapping was included, check for records of compliance.	