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Subject:	Quality System Requirements for Corporative Distributor of COP Holder	Source: GTCO/SAR

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1 OBJECTIVE

- 1.1 This *Instrução Suplementar* - IS details the requirements and procedures which the corporative distributor of a *Certificado de Organização de Produção* - COP holder must comply when its PCF acts as a representative of Agência Nacional de Aviação Civil - ANAC to issue Authorized Release Certificates (Form SEGVOO 003) for articles.

2 REVOCATION

- 2.1 This IS cancels and supersedes CI 21-018A, of May 05, 2008.

3 LEGAL BASIS

- 3.1 Art. 14 of Resolution nº 30, of May 21st, 2008, which set up RBAC and IS and establishes criteria for their elaboration, disposes in its Paragraph 1 that the IS is a supplementary standard, of a general and abstract nature, with external or external and internal effect, aiming to clarify, detail and guide the application of an existing requirement in RBAC. It also disposes that the administrator who intends, for any purpose, to demonstrate the fulfillment of a requirement provided in RBAC may adopt the means and procedures previously specified in IS or present duly justified alternative means of compliance. In the latter case, the analysis and agreement of ANAC are demanded.
- 3.2 Paragraph 2 of Art. 14 of Resolution nº 30, of May 21st, 2008, aforementioned, disposes that the alternative mean/procedure of compliance mentioned in Paragraph 1 of the same article must guarantee a level of safety equal to or greater than that established by the applicable requirement or achieve the objective of the procedure standardized in a IS.
- 3.3 Paragraph 3 of Art. 14 of Resolution nº 30, of May 21st, 2008, mentioned above, disposes that the IS cannot create new requirements or contradict requirements established in RBAC or other normative act.
- 3.4 Considering what is exposed in this section, this IS aims to detail the requirements and procedures which the corporate distributor of a COP holder must fulfill when his PCF acts as a representative of the National Civil Aviation Agency - ANAC to issue an Authorized Release Certificate (Form SEGVOO 003) for articles.

4 DEFINITIONS

- 4.1 **Article:** means a material, part, component, process, or appliance, in accordance with RBAC 21.
- 4.2 **Authorized Release Certificate:** is equivalent to FAA “Airworthiness Approval Tag”.
- 4.3 **COP - *Certificado de Organização de Produção*:** is equivalent to FAA “Production Certificate” - PC.
- 4.4 **PCF - *Profissionais Credenciados em Fabricação*:** is equivalent to Federal Aviation Administration - FAA “Designated Manufacturing and Inspection Representative” – DMIR.
- 4.5 **RBAC:** *Regulamento Brasileiro de Aviação Civil* (Brazilian Civil Aviation Regulation).

5 SUBJECT DEVELOPMENT

5.1 Introduction

5.1.1 **Applicability.** This IS is applicable to all corporative distributors of COP holders.

5.1.2 Some COP holders aiming to enlarge their worldwide business and client support activities, have requested ANAC approval for PCF to issue Authorized Release Certificate (Form SEGVOO 003) for articles. This IS prescribes the conditions under which the COP Holder Distributor will be eligible for approval to distribute articles.

5.2 General

5.2.1 This IS is issued to aid in the surveillance of a distributor who procures new parts and materials and resells some or all of such articles to customers in the aviation industry. This IS may be used to determine the adequacy of the distributor's quality system.

5.2.2 Distributors are subject to a quality system audit conducted by the ANAC at least once every two years. Normally, the ANAC will notify the distributor or COP holder representative and arrange the audit.

5.2.3 An acceptable audit does not relieve the distributor of the responsibility of maintaining consistently acceptable quality system.

5.2.4 Each distributor must have in place a quality system, planned and developed in conjunction with his other management functions. The quality system shall include, but need not be limited to:

5.2.4.1 **A quality system manual**, which includes as applicable:

- a) a statement of commitment by senior management to define the policies and objectives compatible with quality system needs, including the respect to any PCF's technical decisions;
- b) the assignment of responsibilities and delegation of authority granted to the quality department;
- c) a reference or a brief description of written quality system procedures;
- d) the method of updating the quality system including the submission of changes to ANAC;
- e) an organizational chart showing the relationship of the quality department to the rest of the organization and personnel who are responsible for quality systems;
- f) shall be kept current, identifying the standards to which it was written, and shall be readily available to employees or to the ANAC designees;

5.2.4.2 **Written quality system procedures** which provide instructions and data necessary to retain established integrity of articles while in the care of the distributor. Quality system procedures shall include, as applicable, but need not be limited to:

- a) Technical Data Control;
- b) procurement;
- c) Receiving Inspection;
- d) handling, segregation, storage, preservation and packing;
- e) measuring and test equipment;
- f) article release;
- g) record keeping;
- h) training;
- i) Internal Audit;
- j) PCF certification activities.

5.3 **Quality System**

5.3.1 **Technical Data Control**

5.3.1.1 Any technical data shall be maintained in a manner that ensures such data is current and accessible as appropriate. The technical data shall be stored in a manner that will protect it from dirt and damage.

5.3.1.2 A distributor's system shall control and provide the status of all Service Bulletin - SB / Airworthiness Directives - AD applicable at the time of delivery.

5.3.2 **Procurement** procedures for ensuring that all articles obtained for distribution are in conformance with approved design data.

5.3.2.1 The distributor shall maintain a procurement system such that only COP holder approved articles and materials are purchased, and proprietary and licensing rights are observed.

5.3.2.2 The distributor shall have a system in place to assure that special requirements are adequately communicated to the distributor's sources.

5.3.2.3 Distributors of new aircraft parts shall purchase materials directly from COP holder approved suppliers. Deviations from this policy must be disclosed to and approved by the customer prior to part shipment and are not eligible to an official certificate (SEGVOO 003).

5.3.2.4 Distributors shall maintain a list of their approved suppliers and a quality history of each source. This data shall be integrated into the COP holder's supplier control system.

- 5.3.3 **Receiving Inspection** procedures to ensure that all incoming articles are properly identified, documented and visually inspected to detect any apparent damage that may have occurred during shipment.
- 5.3.3.1 Inspectors shall verify that incoming parts and materials are free of defects and are in a good state of preservation.
- 5.3.3.2 The distributor shall maintain an inspection program, which includes periodic verification that standard parts meet technical specification applicable to the part number. The distributor shall ensure that adequate specifications are available to support the inspection process, and that these specifications are current. The distributor shall maintain a record of inspections and tests used to make this verification. Suggested programs include sample tests of physical and chemical properties and checks of manufacturer's test reports.
- 5.3.3.3 A receiving inspection program shall be in place to verify that materials received are of appropriate quality and are from the same lot or batch number as indicated on accompanying certification and/or test reports as applicable.
- 5.3.3.4 Receiving inspection for aircraft fasteners and raw stock shall include a visual check for general workmanship and the presence of certification and/or test reports.
- 5.3.3.5 If inspection stamps are used, a procedure must be in place to control stamp usage and replacement. The procedure must include the following:
- a) a facsimile of each stamp;
 - b) a mean of identifying by whom stamps have been issued;
 - c) a policy for stamps that are lost or stolen;
 - d) a requirement that no stamp will be reused within a year period to two different employees, in case one of them has left the company.
- 5.3.4 **Handling, segregation, storage, preservation and packing** procedures to protect articles against deterioration and damage.
- 5.3.4.1 **Material Control**
- a) Material shall be handled in an appropriate manner and shall be protected from damage and deterioration.
 - b) Special packaging shall be maintained as necessary. The storage area for aircraft parts should be periodically checked for overall effectiveness of storage and identification methods.
 - c) A closed loop system shall exist to implement corrective action following the detection of substandard or otherwise nonconforming parts. Rejected materials must be identified as such and segregated from usable stock. The system shall include a method to notify purchasers of any part that exited the distributor's quality system and does not conform. Distributors shall provide a method to recall or rectify the problem.

- d) Aircraft parts, and parts that may be reasonably assumed to be sold for aircraft use, shall be segregated from non-aircraft parts.
- e) Batch segregation shall be maintained for aircraft fasteners. Additionally, the distributor must maintain records indicating the quantities sold from each batch to each buyer. Purchases minus sales should equal inventory that must balance batch/lot numbered inventories.
- f) Batch segregation shall be maintained for materials requiring flammability testing, and for other items for which segregation is appropriate.
- g) Whenever practical, materials shall be sorted and delivered in the manufacturer's original packaging. Packaging shall identify the manufacturer, distributor, part number, lot or batch number (if applicable), and the quantity.
- h) Flammable, toxic, or volatile materials shall be stored in a safe manner per manufacturer's recommendations or as specified by local fire regulations.
- i) Material subject to damage from electrostatic discharge shall be packaged, handled, and protected with necessary precaution, and in accordance with requirements for handling electrostatic sensitive devices.
- j) The distributor shall ensure that no part number ambiguity exists. Parts shall not be labeled with multiple part numbers if such labeling may cause confusion as to the part's manufacture or applicable specification.
- k) A distributor's alteration to, or replacement of, the data plate or manufacturer's part number is unacceptable.

5.3.4.2 Shelf Life Control

- a) The distributor shall document and maintain a program to assure the identification and proper handling of shelf life limited items.
- b) This program shall include independent component and assemblies containing shelf life limited items.

5.3.4.3 Scrapped Parts Procedure

- a) There shall be a documented procedure in place to mutilate scrapped parts by drilling, grinding, cutting, or other appropriate means. Parts shall be mutilated to the extent necessary to preclude the possibility of being restored and returned to service.
- b) 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, serial number (if applicable), and the date the part was scrapped. The distributor shall retain this record for at least seven years after the scrape.
- c) The procedure shall identify, by position or title, the individual responsible for verifying that parts were adequately mutilated before being discarded.

- d) The distributor shall impose these requirements on their subcontractors and/or repair facilities with which they do business.

5.3.4.4 Housing and Facilities

- a) Appropriate facilities shall be maintained so as to ensure that storage does not damage inventory.
- b) If the distributor engages in aircraft component maintenance as well as parts sales, the storage area must be secured to prevent cannibalizing by maintenance personnel.

5.3.4.5 Measuring and Test Equipment

- a) Test equipment, measuring devices and gages used to verify conformance to applicable standards or specifications, shall be calibrated periodically to maintain accuracy against measurement standards traceable to international or national measurement standards or COP holder's standards.
- b) The distributor shall have procedures to prevent use of the tools/equipments with expired calibration.
- c) Current documentation of calibration status shall be maintained.

5.3.4.6 Article release

- a) The distributor's quality system shall require components and parts 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 to parts or components due to rough handling of the container.
- b) Appropriately trained personnel shall conduct a complete visual inspection of all items being shipped. Inspection shall include, but not limited to:

- I - checking for any obvious physical damage;

- II - verifying that all appropriate plugs and caps are installed;

NOTE: Procedures must warn that tape shall not be used to cover electrical connections or fluid fittings/openings. Adhesive residue can insulate electrical connections and contaminate hydraulic or fuel units.

- III - verifying that the quality, part numbers (including dash numbers and letters), model numbers, serial numbers, etc. of the items being shipped match the accompanying documentation and the customer's request/purchase order;

- IV - verifying the packing slips contain all information required by the customer and important notice for handling;

- V - verifying the shipping container and packing are appropriate for the items being shipped;
- VI - verifying that all appropriate and required documentation (airworthiness approval, material certification, traceability documents, etc.) are at hand, properly completed and signed;
- VII - verifying materials classified as Hazardous Material - HAZMAT have been inspected by appropriately trained personnel and are properly packed, according to International Air Transport Association - IATA specifications.

5.3.4.7 **Record keeping** procedures as objective evidence that articles have been purchased, identified, inspected and certified in conformity with the requirements.

- a) A distributor shall have in place a system governing the storage, distribution, and retrieval of documents confirming that the physical and chemical properties of fasteners and raw stock aircraft materials (materials that are installed on and become part of the aircraft) are in conformance with applicable technical specifications.
- b) Records confirming aircraft fastener integrity, including physical and chemical test reports shall be retained for a minimum of two years after the sale.
- c) Records for materials with flammability requirements shall be retained for a minimum of seven years after the sale. Such records shall verify conformance to applicable flammability requirements.
- d) The distributor shall maintain traceability documentation and all certifications for at least two years from the time of sale to the customer.
- e) The distributor must have documented in its quality manual a system that demonstrates the capability to support traceability of parts to the source of production.
- f) All life limited parts shall have records from the previous operator confirming their life limited status.
- g) Records shall be made only by qualified person and must be protected against damage, alteration, deterioration, and loss.

5.3.4.8 **Training**

- a) Personnel shall be properly trained and competent to perform inspections, parts handling, and record-keeping procedures required by the quality system. This applies to personnel performing supervisory, or receiving and shipping inspector functions.
- b) Inspection personnel must be properly trained and authorized. Such persons must be knowledgeable of inspection techniques, methods, procedures and equipment

used to determine quality. Authorization criteria shall be identified in the distributor's procedures.

- c) The distributor shall maintain a current roster of personnel authorized to perform specific inspection functions and identify the inspection for each authorized person.
- d) Shipping personnel shall be trained and competent in the recognition, packaging, identification, and proper handling of HAZMAT.
- e) All training, both classroom and on-the-job shall be documented and the records maintained for a minimum of two years after the employee leaves the company.
- f) Training records shall include:
 - I - a description of the training and its reference (procedure, standard, requirement, etc.);
 - II - date and number of hours of instruction;
 - III - name and signature of instructor and student;
 - IV - name of the organization conducting the training if performed by an outside agency.

5.3.4.9 Internal Audit: Audits shall be performed in accordance with written procedures or checklists that determine the effectiveness of the quality program. Audit results shall be documented including corrective action of non-compliance. Corrective action shall:

- a) be appropriate and prompt;
- b) correct the discrepancies reported;
- c) locate and correct similar discrepancies, if they exist, in areas not audited;
- d) correct the root cause of the problem evidenced by the discrepancies;
- e) implement follow-up action(s) to eliminate reoccurrence.

For the purpose of this subject, COP holder audit may be considered internal audit, since the team includes COP holder distribution center specialists.

5.3.4.10 PCF certification activities: In order to perform the civil aviation certification activities, PCF shall have an updated designation and shall act within the authorized functions in accordance with the applicable regulations and procedures.

- a) The PCF activities procedure shall contain instructions for each task step (since procurement, incoming inspection, storage/preservation condition/validation verification, up to delivery final inspection) and forms used by the distributor to certify or show traceability of each article distributed, in accordance with applicable RBHA and ANAC procedures.

- b) The quality organization document shall contain instructions for, and samples of, forms used by the distributor to certify or show traceability of each article distributed.
- c) If practical, the instructions for completing the forms may be written on the forms.

6 APPENDIX

Appendix A – Acronyms List

Appendix B – References

Appendix C – IS Change Control

7 FINAL CONSIDERATIONS

- 7.1 The omitted cases will be settled by ANAC.

APPENDIX A – ACRONYMS LIST**A.1 SIGLAS**

a)	AC	Advisory Circular
b)	AD	Airworthiness Directive
c)	ANAC	<i>Agência Nacional de Aviação Civil</i>
d)	ATA	Air Transportation Association
e)	CAR	Canadian Aviation Regulations
f)	COP	<i>Certificado de Organização de Produção</i>
g)	DMIR	Designated Manufacturing Inspection Representative
h)	FAA	Federal Aviation Administration
i)	HAZMAT	Hazardous material
j)	IATA	International Air Transport Association
k)	IS	<i>Instrução Suplementar</i>
l)	PC	Production Certificate
m)	PCF	<i>Profissional Credenciado em Fabricação</i>
n)	RBAC	<i>Regulamento Brasileiro de Aviação Civil</i>
o)	SAR	<i>Superintendência de Aeronavegabilidade (ANAC)</i>
p)	SB	Service Bulletin
q)	TCCA	Transport Canada Civil Aviation

APPENDIX B– REFERENCES

- A.2** ANAC IS 43.9-002, *Uso e preenchimento do Certificado de Liberação Autorizada*
- A.3** ANAC IS 183-002, *Credenciamento de Pessoa Física na SAR*
- A.4** FAA AC 21-43, Production Under 14 CFR Part 21, Subparts F, G, K, and O.
- A.5** FAA Order 8130.21, Procedures for Completion and Use of the Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag.
- A.6** TCCA CAR 563 Distribution of Aeronautical Products.

APPENDIX C – IS CHANGE CONTROL

IS CHANGES	
ITEM	CHANGE