

# Part-21 Implementation Workshop

## Suspected Unapproved Parts (SUPs)

Ionuț FLORIAN, EASA

Cologne, 26<sup>th</sup> October 2023

**Your safety is our mission.**

An Agency of the European Union 

# Outline

- EASA regulatory framework for SUPs;
- The Agency process for managing SUPs;
- 10 years statistics of EASA's SUP reports.

# EASA regulatory framework for SUPs;

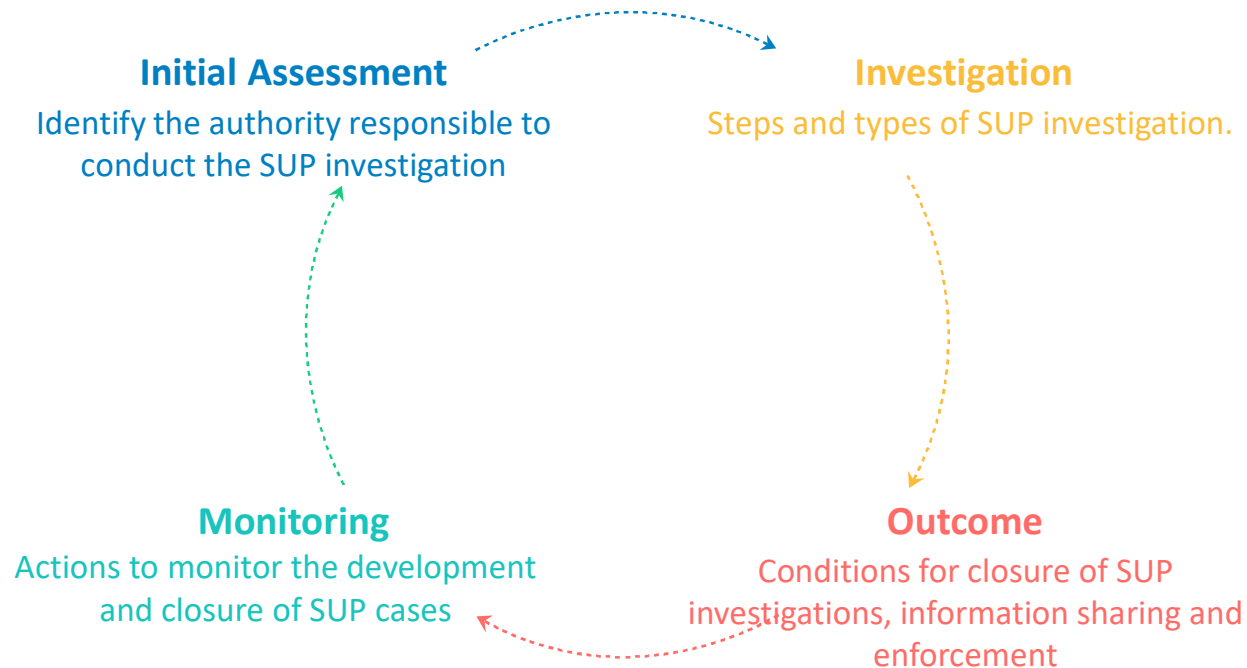
## → SIB 2017-13R1, issued 24/10/2018

- the use of products, components or materials, from unknown, suspect origin, or unserviceable critical components – mandatory reportable under CIR (EU) 2015/1018.

## → Scope of EASA's parts and organisations certification approval:

- Parts: the Agency is competent to certify parts in accordance with Article 77(1) of Regulation (EU) 2018/1139 .
- Production organisations – art. 77(2)(b)NBR: the Agency certifies only those production organisations that are located outside the territory of the Member States and those production organisations within the territory of the Member States, if requested by the Member State concerned.
- Maintenance organisations – art. 77(2)(b)NBR: the Agency certifies only those maintenance organisations that are located outside the territory of the Member States.

# The Agency process for managing SUPs



# Initial assessment of an SUP report

- The initial assessment determines:
  - which competent authority has approved the organisation where the suspected unapproved part originates (production organisation, maintenance organisation, distributor etc.);
  - which competent authority has approved the original part, as this authority can confirm if the part is unapproved.
    - Possible scenarios:
      - Part originates from a Foreign Organisation approved by the Agency.
      - Unapproved organisations.
      - Activity alleged to be of criminal nature.

# Investigation of SUPs reports – EASA is the CA

- EASA is the competent authority (CA);
  - SUP report is reviewed and allocated by the SDM team to the PCM of the part/product and/or TL responsible for the oversight of the organisation.
  - PCM/TL assess each SUP case individually to decide the appropriate level of involvement/investigation:
    - Extensive Full Investigation
      - Critical part, Large population of SUP, SUP used on in-service product, misproduced part, or Forged Form 1)
    - Limited Light Investigation
      - Non-critical part, Isolated case; Scrapped part; Error on Form 1;
  - PCM and/or TL to ensure that safety actions are adequately taken.

# Investigation of SUPs reports – EASA is NOT the CA

- EASA is NOT the competent authority (CA)
  - SUP forwarded to the CA that has either certified the SUP or the organisation where the SUP originated from
    - EASA Member State
      - EASA SDM team informs the CA and coordinates the SUP publishing on the EASA webpage.
    - Third countries
      - EASA SDM team forwards the SUP report to the respective ICAO contracting state
  - BASA framework
    - USA
    - Canada
    - Brazil
    - China
    - Japan
    - UK

# Outcome of SUP investigations

- Conditions for closure of SUP investigations:
  - The part is confirmed not to be a SUP.
  - As result of a lighter investigation case (documentation errors).
  - The investigation was transferred to the other competent authority.
  - The part was confirmed to be an unapproved part, but the issue was addressed;
- Dissemination of Suspected Unapproved Part Notification and/or safety information
  - The SUP is published on the EASA SUP [webpage](#).
  - EASA may issue an SIB (Safety Information Bulletin) or AD (Airworthiness Directive);
- Other actions
  - Reinstating compliance
  - Suspension or revocation
  - Termination of mutual recognition
  - Fines and penalties
  - Involvement of LEA



# Monitoring of SUP cases

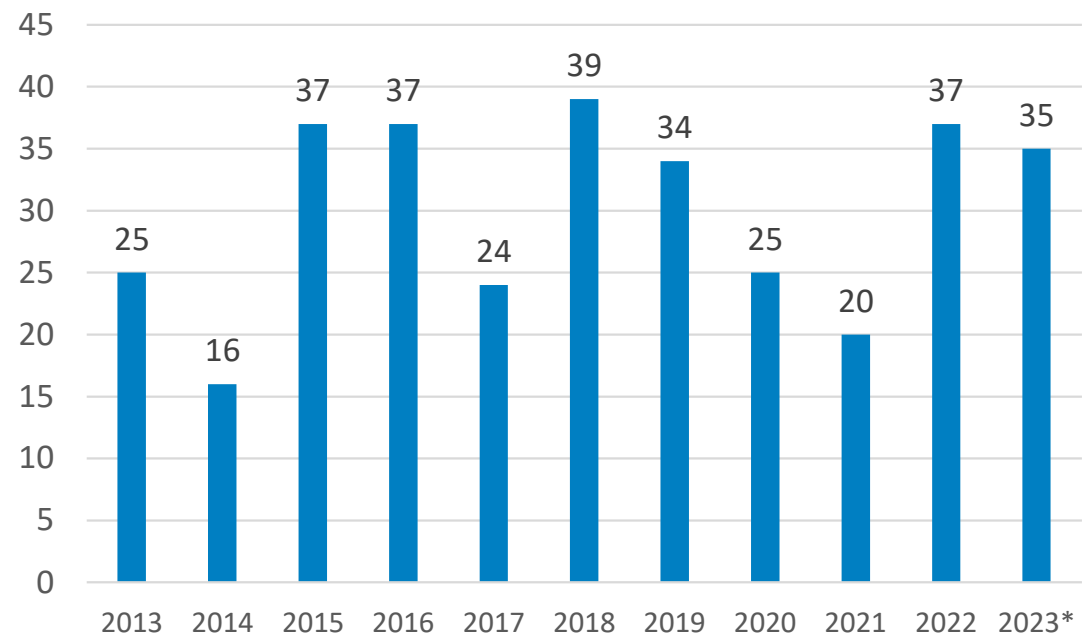
→ Monthly Screening Meeting.

→ SUP cases are included in the monthly occurrence screening meeting, and reviewed to ensure that relevant parties were involved and the cases were addressed properly.

# SUP statistics: Report Intake by Year, 2013 – 2023

## SUP Report Intake by Year

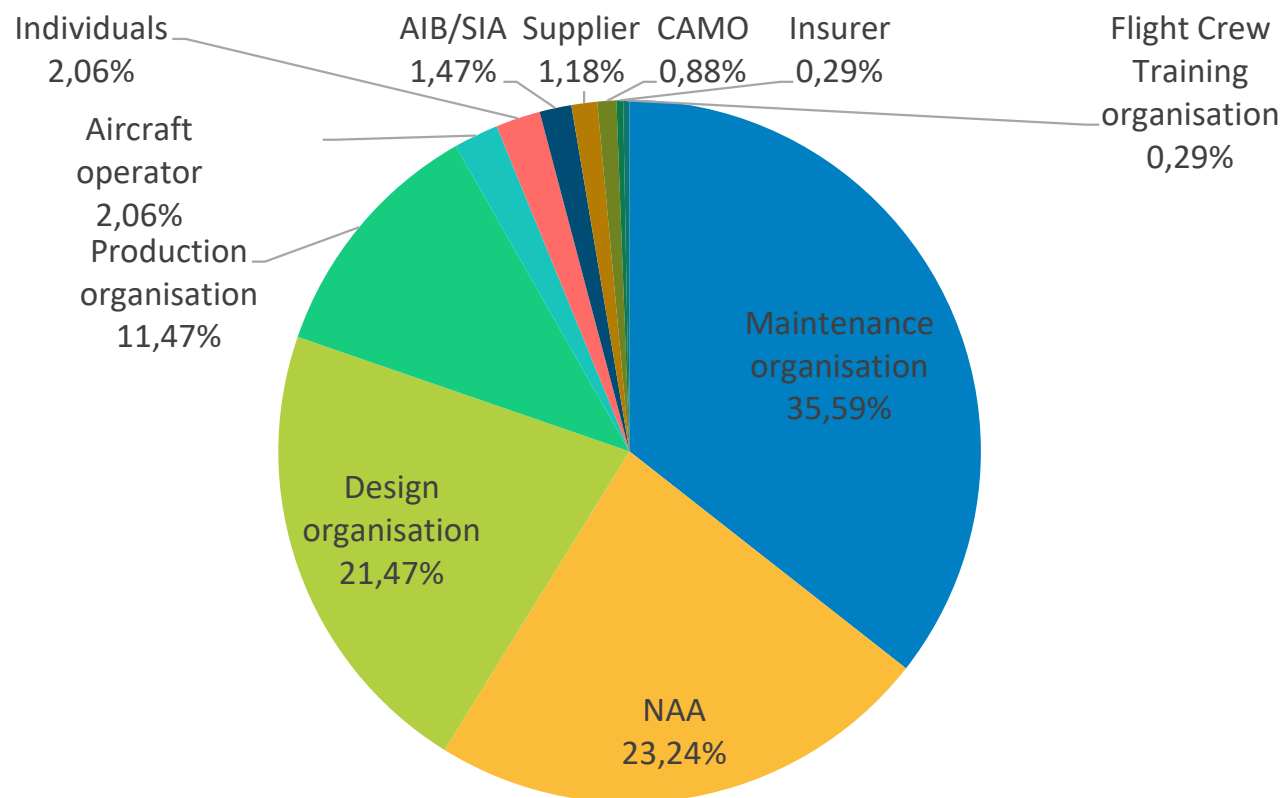
- 2018 - Highest number of SUP reports.
- 2022 – Increasing trend, second highest number of SUP reports.



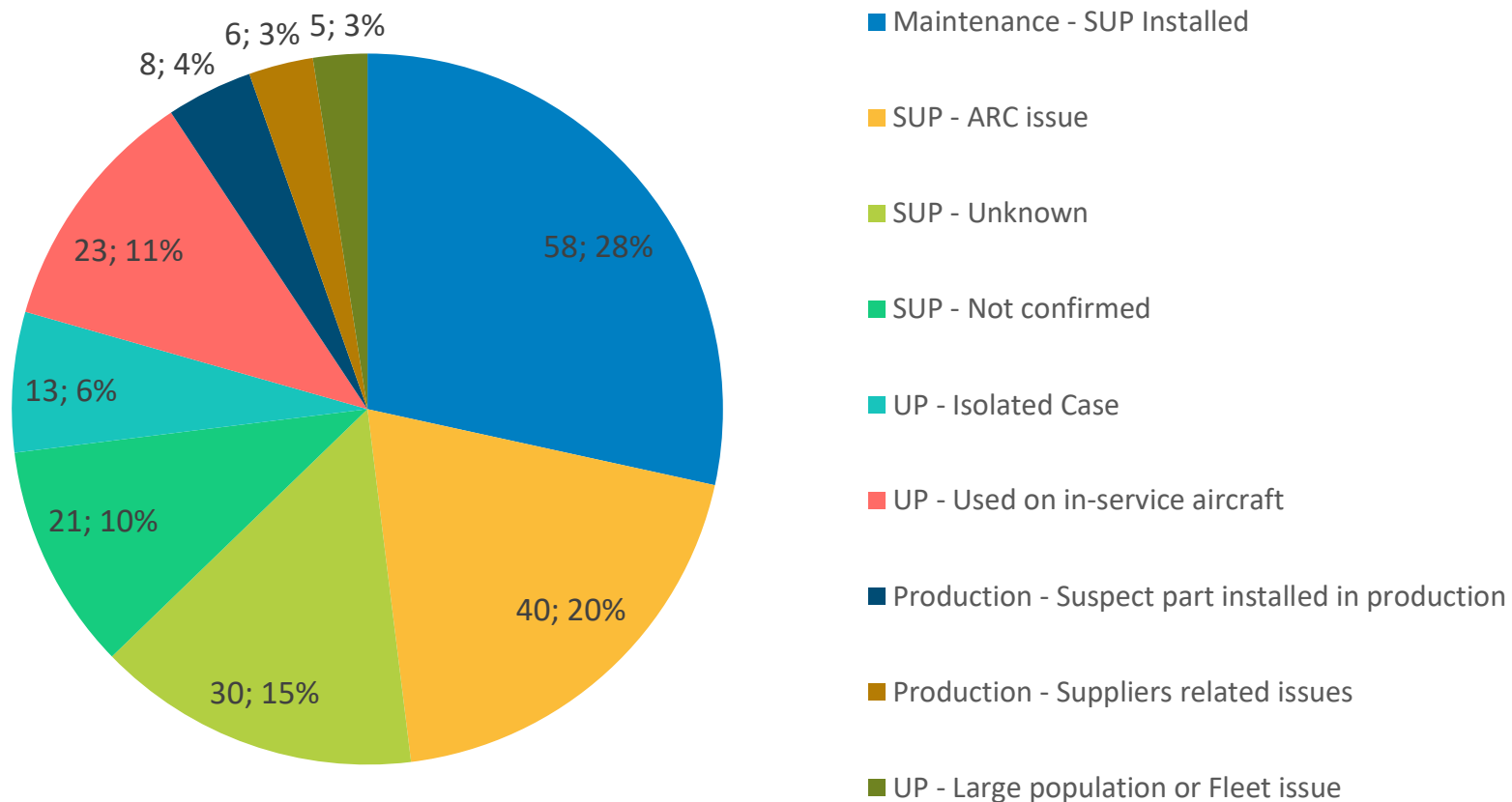
# SUP statistics: Type of reporters, 2013 – 2023

## Types of SUP reporters

- Main SUP reporters:
  - Maintenance
  - NAA
  - Design
  - Production



# SUP statistics: Key issues raised, 2013 – 2023



# Thank you for your attention!

Any questions/comments?

[easa.europa.eu/connect](https://easa.europa.eu/connect)



**Your safety is our mission.**

An Agency of the European Union 