



Bermuda Advisory Circular BAC-AW-03	Issue: 6 Effective: 30-Nov-2021
INSTALLED AIRCRAFT PARTS REMOVED TO SERVICE ANOTHER AIRCRAFT (PARTS ROBBERY)	

GENERAL

Bermuda Advisory Circulars are issued to provide advice, guidance and information on standards, practices and procedures necessary to support Overseas Territory Aviation Requirements.

PURPOSE

This Bermuda Advisory Circular provides guidance concerning the removal of aircraft parts to service another aircraft where the donor and recipient aircraft are operated within the same fleet (parts robbery).

Where the donor and recipient aircraft are not operated under the same AOC, refer to OTAC 145-12 for the certification of serviceable parts removed from aircraft.

RELATED REQUIREMENTS

This Circular relates to:

- [OTAR Part 39 Continued Airworthiness Requirements](#)
- [OTAR Part 43 General Maintenance Requirements](#)
- [OTAR Part 145 Aircraft Maintenance Organisation Approval](#)
- [OTAC 145-12 Aircraft Parts - OTAR Part 145.59](#)

CHANGE INFORMATION

Issue 1 - March 2016

Issue 2 - August 2016

- Section 2 - Added additional guidance to make clear when this BAC applies.
- Section 4 - Removed the requirement that the donor and recipient aircraft must be in the same operator's fleet.
- 5.2 - Added requirements for the transit and storage of parts when removed and not installed directly to the recipient aircraft.
- Appendix A - Removed Part Two for the installation of the part. A CRS will be issued by the AMO in accordance with OTAR 43 requirements.

Issue 3 - March 2021

- Amended to remove the Appendix A from this document and to remove references to Appendix A. These references are replaced by reference to OTAA Form 71 and OTAR Part 145.59. Form 71 was introduced at OTAR 145 Issue 9.

Issue 4 - May 2021

- Deleted reference to BAC-AW-01, which was no longer applicable.

Issue 5 - July 2021

- Deleted additional reference to BAC-AW-01, not addressed at Issue 4.

Issue 6 – November 2021

- Amended to clarify differences between in-fleet robberies and certification of serviceable parts from aircraft. Reference to OTAA Form 71 removed.

Change bars in the left margin indicate changes to the document at the current issue.

ENQUIRIES

Enquiries regarding the content of this Circular should be addressed to the Bermuda Civil Aviation Authority. Enquiries can be sent by email to info@bcaa.bm.

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2 INTRODUCTION

- 2.1 During the normal operation of a fleet of aircraft, lack of an available replacement component can occur requiring an operator to consider the removal of a required part from one aircraft to service another. This situation (robbery) is recognised by many regulatory authorities that have accordingly developed specific regulations.
- 2.2 Regulations concerning aircraft robbery are generally developed for national aviation industries and therefore are not intended for cross international boundaries.

3 APPLICABILITY

- 3.1 When an aircraft is grounded due to the non-availability of a part it is allowable to install a serviceable part removed from another Bermuda registered aircraft, subject to the 'donor' aircraft meeting the eligibility requirements in Section 4 of this Advisory Circular.
- 3.2 This Advisory Circular is not applicable if parts removed are issued with an acceptable serviceable release certificate in accordance OTAR 43.105(b) and 145.59. It is the responsibility of the aircraft maintenance organisation to determine if they may issue such a serviceable release certificate following an inspection of the removed part, under those requirements.
- 3.3 The guidance detailed in this Advisory Circular has been developed to assist operators during an AOG situation where there are no readily available spares.
- 3.4 Where organisations are removing serviceable parts for sale to third-party organisations or to hold in stock, refer to OTAC 145-12 Paragraphs 4.2 and 4.3.

4 BERMUDA APPROVED MAINTENANCE ORGANISATIONS

- 4.1 This Bermuda Advisory Circular sets out the minimum requirements to be met for parts robbery. Procedures for the removal and installation process should be described in the contracted BCAA approved maintenance organisation exposition (MOE) or Bermuda MOE Supplement, to be approved by the BCAA.
- 4.2 The BCAA approved MOE procedure will also describe the process and format of the component serviceable label.

Note: A serviceable label differs from a Release Certificate as the former does not contain a CRS statement.

5 ELIGIBILITY REQUIREMENTS DONOR AND RECIPIENT AIRCRAFT

- 5.1 The eligibility requirements for a part robbery (donor aircraft) are as follows:
- (a) The aircraft must be on the Bermuda register; and
 - (b) The aircraft must be in an airworthy condition, or in a controlled maintenance environment undergoing maintenance; and
- 5.2 The recipient aircraft of a parts robbery must be on the Bermuda register and operated by the same operator as the donor aircraft.

6 PARTS ROBBERY REQUIREMENTS

- 6.1 The aircraft maintenance organisation should issue a Serviceable label to all serviceable aircraft parts removed from a Bermuda registered aircraft subject to compliance with the following:
- a) The donor and recipient aircraft meet the eligibility requirements of this document outlined in paragraph 4 above;
 - b) The maintenance organisation shall ensure that the part is removed from the donor aircraft, in accordance with approved maintenance data, by an appropriately qualified person, and using the tools and equipment specified;
 - c) The last flight operation with the part fitted revealed no faults on that part or the related aircraft system;
 - d) The aircraft part shall be inspected for, satisfactory condition including, damage, corrosion or leakage and compliance with any additional manufacturer's maintenance instructions and the requirements of the aircraft's maintenance programme;
 - e) The aircraft records shall be reviewed for any unusual events that could affect the serviceability of the part, such as involvement in accidents, incidents, heavy landings or lightning strikes. A serviceable label shall not be issued, if it is suspected that a part has been subjected to extremes of stress, temperatures or immersion which could affect its operation;
 - f) A maintenance history record including flight hours/cycles/landings as applicable must be available for all used serialised aircraft parts including details of scheduled maintenance requirements derived from the donor's aircraft maintenance programme and maintenance planning schedule;
 - g) Compliance shall be established with any continued airworthiness instructions (ICA) for applicable modifications and repairs for the robbed part by incorporating the ICAs into the recipient's aircraft maintenance programme and maintenance planning schedule;
 - h) Any service life limited parts shall be determined and their service life remaining should be transferred to the recipient aircraft records; and
 - i) Compliance with applicable Airworthiness Directives shall be established and/or maintained particularly where non-terminating action had previously been taken;
 - j) Where applicable, mandatory reporting such as CPCP and SSID records shall be transferred including any pending actions associated with a modification or supplemental inspection regime; and
 - k) A modification status review shall be undertaken of the recipient aircraft and part to ensure eligibility for fitment;
 - l) The inspection and functional test section of the aircraft maintenance manual may not address sufficient verification that the used aircraft part and associated system is functioning correctly. Consideration shall be given to undertaking component/system functionality testing that ordinarily mitigated in the maintenance manual by simple high level part testing such as BITE in the case where a newly overhauled part is to be installed;

m) Under no circumstances shall a donor aircraft be fitted with an unserviceable part in replacement for such removed to service another aircraft. The aircraft maintenance organisation shall document the removal of the part in the donor aircraft's Technical Log.

6.2 Parts removed under this process are not intended for Storage however, where a part is removed and cannot to be installed directly to the recipient aircraft, appropriate actions shall be carried out with regard to transit and storage in accordance with the manufacturer's recommendations. The following requirements shall be followed:

(a) Parts shall be stored in accordance with the manufacturer's recommendations;

(b) Parts requiring lubrication shall be lubricated prior to placing it in stores, and any previously applied lubricants must be fully purged; and

(c) Any parts removed that have a storage life, shall have the storage life applied. The storage life of any parts should start from the date of the donor aircraft's last flight. The storage conditions of the part shall be taken into account when determining whether a part has exceeded its storage life, because the manufacturer's storage lives are normally based on the premise that the part is stored in ideal conditions.

7 OPERATOR LIAISON

7.1 The Operator should furnish to the maintenance organisation data required of paragraph 5. The maintenance organisation should ensure suitable arrangements are in place to secure necessary data from the Operator.

7.2 The removal and installation of used aircraft parts will inevitably have a detrimental effect on statistical and actual aircraft system reliability. The maintenance organisation should ensure that the operator's maintenance records readily identify details of aircraft parts robbery.

7.3 The operator must be furnished with copies of all maintenance records and certificates relating to an aircraft parts robbery.

8 CERTIFICATE OF RELEASE TO SERVICE

8.1 The aircraft maintenance organisation shall issue a Certificate of Release to Service to the aircraft for all maintenance actions associated with these requirements in accordance with OTAR Part 43.105(a).