
BHUTAN CIVIL AVIATION AUTHORITY



GM-AIR-06

Guidance on Reporting of suspected unapproved parts

Issue 02
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Foreword

This Guidance material is issued by the Bhutan Civil Aviation Authority (BCAA) to assist BCAR-145 Approved Maintenance Organisation and BCAR-M Subpart G Approved Continuing Airworthiness Management Organisation in understanding the requirements for the identification and reporting process to the BCAA and other relevant authorities, and the information expected to be included in a report. It is intended to promote the timely reporting and ensure consistent implementation and compliance with the applicable requirements of the BCAR-145, BCAR-M, and the occurrence reporting provisions



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Record of Revision

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01	08 April 2026	Initial Issue (issued as circular)
02	21 July 2026	Changed from circular to guidance material.

Table of Content

Foreword	2
Record of Revision.....	3
Table of Content.....	4
1. Unapproved Parts	5
2. Reporting.....	6
3. The Certifying Person and User Responsibility	7
4. Other States SUP sites.....	7

1. Unapproved Parts

Suspected Unapproved Parts (SUP) includes products, components, or materials, from unknown, or suspect origin, or unserviceable critical components. The part itself or its associated paperwork can call it into question.

For the purpose of this Circular an Unapproved part is a part or material intended for installation on a type certificated product/aircraft, which has been neither manufactured according to approved procedures, nor conforms to an approved type design; or it fails to conform to declared specifications or accepted industry standards (i.e. standard parts).

Unapproved parts include, but are not limited to:

- a) Parts specified in the illustrated parts catalogues (IPC) of a type certificated aircraft, but which have been manufactured, reclaimed or reworked and then marked by an unauthorised source and provided with documents which indicate falsely that the part(s) are genuine and conform to the approved type design, or meet a particular industry standard and are offered for use as conforming with an aircraft manufacturer's authorised IPC.
- b) Parts shipped directly to users by manufacturers, suppliers, or distributors who do not themselves hold appropriate production approvals for the parts, and have not been authorised to make direct shipments to users or stockists by the Type Certificate holder, who alone has production approval, e.g. production overruns. This is a particular phenomenon in the United States.
- c) Parts which have not been maintained, overhauled or repaired in accordance with the requirements of approved airworthiness data and/or statutory requirements, or that have been maintained, overhauled or repaired by persons not authorised to perform and certify these functions.

When in doubt about the origin of a part, maintenance organisations, aircraft owners, operators, independent certifying staff, manufacturers, and parts suppliers should check the information in the SUP list before accepting the part into stock or fitting it to an aircraft. If a part in the SUP list is held in stock, it should be quarantined until a determination can be made regarding its eligibility for installation. BCAA cannot always resolve SUP cases, mainly due to the lack of required information. For example, when:

- A SUP with an allegedly forged Authorised Release Certificate comes from a foreign maintenance organisation, supplier or distributor and it is difficult to obtain feedback from the National aviation safety authority.
- The origin of the SUP is impossible to determine.
- A potential buyer has been sent an Authorised Release Certificate for pre-assessment and they believe that the documentation has questionable provenance indicating that an SUP case might exist.
- A part was unlawfully removed from a maintenance facility and is expected to appear on the market with forged documentation or untraceable history.

2. Reporting

A SUP should be reported to the BCAA, the Type Certificate holder and the CAA of the originating State. Reports to the BCAA can be sent by completing the occurrence reporting in a form and manner accepted by BCAA.

BCAR-OC, Appendix 5, paragraph 3(11) defines one of the occurrences subject to reporting as ‘the use of products, components, or materials, from unknown, suspect origin, or unserviceable critical components’ (SUP).

To assist in tracing unapproved parts or material, persons raising an MOR should, as far as possible, provide the following information on their report:

- a) The name of the suspected unapproved part.
- b) Part number, or any other number on the part.
- c) Serial number of parts.
- d) List the next higher assembly that the suspected unapproved part is assembled into (i.e. fuel pump, engine, landing gear) and list part number, if known.
- e) Quantity of suspected unapproved parts found or identified.
- f) Make and model number of the aircraft or component that the suspected unapproved part is applicable to.
- g) The identification of the commercial source of the suspected unapproved part. If the part is identified with Part Manufacturer or Distributor marking, this should be quoted.
- h) Describe any pertinent facts relating to the suspected unapproved part and identify where part may be inspected (provide photos, invoices, etc., if available).
- i) The date when the suspected unapproved part was discovered.
- j) Name and address in full or the location where suspected unapproved part(s) was discovered.

3. The Certifying Person and User Responsibility

The Certifying Person (User) can be either the Approved Organisation, a person authorized in accordance with that organisation's Exposition, or an appropriately Type Rated Licensed Engineer, who issues the Certificate of Release to Service for installation of an aircraft part into an aircraft, its engine(s), propeller(s) or equipment.

The User of an aircraft part is responsible for ensuring that the part is serviceable and conforms to the standard determined by the appropriate Type Certificate holder as being suitable for the intended application.

4. Other States SUP sites

This list of links to other states SUP sites is not exhaustive but includes the most significant and relevant regulatory systems in force:

- a) EASA Suspected Unapproved Parts <https://www.easa.europa.eu/en/domains/aircraft-products/suspected-unapproved-parts>
- b) Federal Aviation Administration Suspected Unapproved Parts (SUP) Program <https://www.faa.gov/aircraft/safety/programs/sups/upn>
- c) United Kingdom Civil Aviation Authority <https://www.caa.co.uk/our-work/make-a-report-or-complaint/reportsomething/suspected-unapproved-parts/>

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