

Traceability, FIFO Stock control, Counterfeiting

A supplier to CPL is responsible for establishing & implementing a material control system that enables traceability from base material through the manufacturing process up to despatching to CPL. The supplier's traceability system is to ensure batch or serial numbering is maintained as a positive traceable identification throughout manufacturing & assembly.

The suppliers product identification and control system to be sufficiently comprehensive, enabling correct sequence control of material ensuring 'First in First Out' (FIFO) activity, can be clearly perceived. Any inspection & test status to be stored & be easily obtainable from the designated system. The identification system must be linked to all necessary processes & or base material certificate/information. When material is segregated it must be clearly identified on the system along with the process status clearly identified on the product.

The supplier is responsible for validating all incoming material (whether self purchased or free issued) to required specifications including all required documentation. The supplier to ensure that any physical material ID, is clearly legible and maintained on any part material sections/pieces as necessary.

There will be occasions when CPL request full traceability of material back to the original manufacture of a product/material. Where suppliers buy in product/material from sub tier suppliers, it is the tier one supplier's responsibility, to flow down the relevant requirements to the sub tier suppliers.

If the supplier is using lifed product (product that has limited life span) it is essential that the suppliers system has sufficient control to prevent use of any expired lifed material.

Counterfeiting

The aerospace industry has severe concerns on the level of counterfeit parts that are entering the supply chain. These parts are subject to an uncontrolled manufacturing regime and do not meet standards and quality required.

AS9100 requires all certified companies to implement a procedure around the detection of counterfeit parts (clause 8.1.4).

CPL does not procure electrical, electronic or electromechanical parts or carryout repair on items and assemblies return. Therefore counterfeiting would be confined to the supply of material, components and subcontract processing.

Definitions

An unauthorised copy, imitation, substitute or modified part (e.g. material, part, component) which is knowingly misrepresented as a genuine part of an original authorised manufacturer. That is:

- Parts which do not contain the proper internal construction consistent with the ordered part. (die, manufacturer, wire bonding, etc.)
- Parts which have been used, refurbished or reclaimed, but are represented as new product.
- Parts which have different package style or surface plating/finish than the ordered parts.
- Parts which have not successfully completed the Original Component Manufacturer's (OCM)'s full production and test flow but are represented as completed product.
- Parts sold as up screened parts which have not successfully completed up screening.
- Parts sold with modified labelling or markings intended to misrepresent the parts' form, fit, function, or grade

Mitigation

The following actions are carried out by CPL to prevent counterfeit parts entering the supply chain.

- Only use approved suppliers
- Ensure all documentation provided is completed and correct
- Maintain traceability on key items as appropriate, this may be material lot traceability, item traceability, subcontractor traceability
- Not accepting material or items where the required traceability is not available, do not process these items which may generate a misleading appearance of traceability to the customer
- Independent verification of items supplied based on an assessment from the customer on the risk of supply

Detection

All staff and suppliers must be made aware that counterfeit items must be reported whatever the level of suspicion. Items may be detected by:

- Missing documentation
- Incorrect documentation
- Unapproved supplier
- Suspicious behaviour during processing, material does not behave as expected

Actions upon detection of possible counterfeit parts.

The identity of material and parts is verified upon receipt. Independent testing is available if material is suspect.

If counterfeit items or material is detected the following must occur.

- Quarantine material or parts so that they cannot be used inadvertently, do not return to the supplier.
- Consider all other orders that may have been affected by the supply and take appropriate actions
- Inform the customer and as appropriate, government reporting organizations, industry supported reporting programs and criminal investigative authorities.
Wait for instructions on the disposal of the items or material.
- Enter details of the concern into the company's corrective action system to carry out a root cause analysis and identification of actions to prevent recurrence.