

## RA 5885 – Identification of Products, Parts and Appliances (MRP Part 21 Subpart Q)

### Rationale

To comply with configuration control requirements, each Product, Part or Appliance to be fitted on an Air System needs to be individually identified. There are important safety, operational and economic benefits if the possibility of recurrent failure of a Product, Part or Appliance can be confined to identifiable material batches, components, equipment or Air System. Furthermore, unidentifiable Parts and Appliances lack traceability and thus can lead to excessive Maintenance and economic burden in rectifying Airworthiness concerns, or increased Airworthiness Risk if applicable Products, Parts or Appliances cannot be identified and issues rectified. To prevent this, RA 5885 requires the identification and traceability of all Products, Parts and Appliances.

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### Regulation 5885(1)

#### Identification of Products (MRP Part 21.A.801)

5885(1) The Type Airworthiness Authority (TAA)<sup>1</sup> **shall** ensure that identification of Products includes the specific information of the Manufacturer's name, Product designation, and the Manufacturer's Serial Number.

### Acceptable Means of Compliance 5885(1)

#### Identification of Products (MRP Part 21.A.801)

1. Any organization that manufactures an Air System or engine **should** identify that Air System or engine by means of a fireproof plate that has the information specified in RA 5885(1) marked on it by etching, stamping, engraving, or other approved method of fireproof marking. The identification plate **should** be secured in such a manner that it is accessible, legible and not likely to be defaced or removed during normal service (including Maintenance) or lost or destroyed in an Accident.
2. Any organization that manufactures a propeller, propeller blade, or propeller hub **should** identify it by means of a plate, stamping, engraving, etching or other approved method of fireproof identification that is placed on it on a non-critical surface, contains the specified information, and is not likely to be defaced or removed during normal service or lost or destroyed in an Accident.
3. All Products and main assemblies within them **should** be fitted with a modification plate where practicable to do so.

### Guidance Material 5885(1)

#### Identification of Products (MRP Part 21.A.801)

4. In addition to the requirement to mark Products, MOD policy also requires allocation of a unique North Atlantic Treaty Organization (NATO) Stock Number, there are detailed requirements for the marking of packaging. Further details are provided in Knowledge in Defence<sup>2</sup>.

<sup>1</sup> Where the Air System is ►not UK MOD-owned, Type Airworthiness (TAW) management◄ regulatory responsibility by either the TAA or Type Airworthiness Manager (TAM) needs to be agreed within the Sponsor's approved model ►◄; refer to RA 1162 – Air Safety Governance Arrangements for Civilian Operated (Development) and (In-Service) Air Systems, or refer to RA 1163 – Air Safety Governance Arrangements for Special Case Flying Air Systems. Dependant on the agreed delegation of TAW responsibilities TAM may be read in place of TAA as appropriate throughout this RA.

<sup>2</sup> MOD's Knowledge in Defence via the 'Gov' site <https://www.gov.uk/guidance/knowledge-in-defence-kid>.

**Regulation  
5885(2)**

**Handling of Identification Data (MRP Part 21.A.803)**

5885(2) Withdrawn – Not applicable to TAw Management.

**Acceptable  
Means of  
Compliance  
5885(2)**

**Handling of Identification Data (MRP Part 21.A.803)**

5. Withdrawn – Not applicable to TAw Management.

**Guidance  
Material  
5885(2)**

**Handling of Identification Data (MRP Part 21.A.803)**

6. Withdrawn – Not applicable to TAw Management.

**Regulation  
5885(3)**

**Identification of Parts and Appliances (MRP Part 21.A.804)**

5885(3) The TAA or Commodity Chief Engineer (CE) **shall** ensure that each Part or Appliance is permanently and legibly marked in accordance with (iaw) the applicable design data<sup>3</sup>.

**Acceptable  
Means of  
Compliance  
5885(3)**

**Identification of Parts and Appliances (MRP Part 21.A.804)**

7. If a Part or Appliance is too small or that it is otherwise impractical to mark a Part or Appliance with any of the information specified in RA 5885(3), the authorized release document accompanying the Part or Appliance, or its container **should** include the information that could not be marked on the Part.

8. Any private markings used by the manufacturer to facilitate the assembly of Parts and Appliances **should not** be located in a position where they will confuse other identification marks.

9. All Parts and Appliances **should** be fitted with a modification plate where practicable to do so.

10. European Part Approval (EPA) mark, for Parts and Appliances produced under European Union Aviation Safety Agency (EASA) approval that can be installed in military registered Air Systems, **should** be considered as a recognized mark for Parts and Appliances.

11. United Kingdom Part Approval (UKPA) mark, for Parts and Appliances produced under UK Civil Aviation Authority Design Organization Approval (UK CAA DOA) that can be installed in military registered Air Systems, **should** be considered as a recognized mark for Parts and Appliances.

**Guidance  
Material  
5885(3)**

**Identification of Parts and Appliances (MRP Part 21.A.804)**

12. Where a design change does not affect interchangeability and so does not require a change in the Part or Appliance's part number, the change is to be identified on the modification plate. If the design change is just software related and can be embodied locally, the procedure for identifying the change on the item and / or its technical record is to be defined in the Instructions for Sustaining Type Airworthiness (ISTA)<sup>4</sup>.

13. The design drawings are to specify the requirements for fitting the modification plate. For Technical Standard Order (TSO) or European TSO ((E)TSO)<sup>5,6</sup> articles which do not require such a marking to comply with the relevant design specification, there is no requirement to fit a modification plate.

<sup>3</sup> The Design Organization determines what data is applicable for the marking of Parts and Appliances.

<sup>4</sup> Refer to RA 5815 – Instructions for Sustaining Type Airworthiness. A leaflet in the Topic 2(N/A/R)1 would be an appropriate solution. Details on software change control are provided in the MOD's Knowledge in Defence (KiD).

<sup>5</sup> The (E)TSO abbreviation will be taken to mean a TSO from the UK, USA or a European TSO.

<sup>6</sup> Refer to RA 5875 – (European) Technical Standard Order (MRP Part 21 Subpart O).

**Guidance  
Material  
5885(3)**

14. Where the TAA or Commodity CE agree that the fitting of a modification plate is impractical, an alternate method of marking is to be agreed via the Local Technical Committee<sup>7</sup>.
15. In addition to the requirement to mark Parts and Appliances, MOD policy also requires allocation of a unique NATO Stock Number, and there are detailed requirements for the marking of packaging. Further details are provided in Knowledge in Defence<sup>2</sup>.

**Regulation  
5885(4)**

**Identification of Critical Parts (MRP Part 21.A.805)**

- 5885(4) The TAA or Commodity CE **shall** ensure that, in addition to the requirements of RA 5885(3), each manufacturer of a Part which has been identified as a critical part<sup>8</sup> **shall** permanently and legibly mark that Part with a Part number and a serial number.

**Acceptable  
Means of  
Compliance  
5885(4)**

**Identification of Critical Parts (MRP Part 21.A.805)**

16. The Design Organization **should** prepare, for inclusion in the Design Records, a list of all Parts.
17. The list of Parts **should** include all Critical Parts, Principal Structural Elements and those Parts likely, in the case of a Fault, to affect Airworthiness or operational effectiveness.
18. Drawings of Parts **should** contain the following:
- The statement 'Critical Part' or 'Principal Structural Element' if applicable.
  - The information to be recorded to ensure traceability.
  - Show where such information is to be marked or recorded.

**Guidance  
Material  
5885(4)**

**Identification of Critical Parts (MRP Part 21.A.805)**

19. Traceability is the capability to trace a Part through its usage. In this case appropriate marking of Parts enables them to be traced through production and into use<sup>9</sup> to enable data exploitation and investigations.

**Regulation  
5885(5)**

**Traceability of Parts**

- 5885(5) Withdrawn content subsumed into RA 5885(4).

**Acceptable  
Means of  
Compliance  
5885(5)**

**Traceability of Parts**

20. Withdrawn content subsumed into RA 5885(4).

**Guidance  
Material  
5885(5)**

**Traceability of Parts**

21. Withdrawn content subsumed into RA 5885(4).

<sup>7</sup> Refer to RA 5301 – Air System Configuration Management.

<sup>8</sup> A Critical Part is a Part, the failure of which could have a catastrophic effect on the Air System in which it is installed.

<sup>9</sup> The requirement for recoding the part usage once In-Service is detailed in RA 4813 – Maintenance Records (MRP 145.A.55).

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