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NEWSLETTER

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AMROBA fully supports CASA's consultation changes to bring to fruition regulatory reform.

1. All NAAs Provide/Control AME Licencing Examinations

We once had a comparable AME licencing system to what is provided by EASA, FAA, etc. The process should be simple. Most MRO workers complete an aviation trade training course, civil or military, or an allied trade, complete a workplace regulatory experience period, plus self-study, then sit and pass the NAA's applicable examinations. What industry wanted was the removal of duplication of RTO's examinations and the CASA Basic Examinations. Like EASA, industry expected the NAA examinations to be provided/controlled by the RTO on behalf of CASA.

Skill training is very important to aviation safety. EASA, FAA are more standardised with the ICAO minimum AME training standards.

Basically, when the implementation of CASR Part 66 failed to adopt all provisions of EASR Part 66 and Part 147, CASA applied a completely different system in Australia.

Read More

2. Trans-Tasman Mutual Recognition Agreement.

Firstly, we need CASA to meet the intent of this agreement and keep impediments to mutual recognition to a minimum. The purpose of this agreement was to improve recognition of registered occupation (AME/LAME) between Australia & New Zealand. The fundamental purpose of mutual recognition is to promote economic integration and increased trade between participants by reducing regulatory impediments to the movement of goods and people in registered occupations across jurisdictions.

The TTMRA was made so government departments/agencies "harmonised the occupations they are responsible for: e.g. AME & LAME

The simple fix to improve productivity and access in the Australasian market was to "harmonise" closely with the NZ maintenance and manufacturing personnel VET qualifications. This concept was abandoned by CASA during the 2000s when Byron focused CASA on the EASA regulations that provided harmonisation for Europeans, not Australasia.

"The TTMRA is built upon, and is a natural extension of, the MRA. It represents a deepening of the Australia-New Zealand Closer Economic Relations Trade Agreement (ANZCERTA). The impetus for the TTMRA came from government recognition that there were regulatory impediments to trade between New Zealand and Australia."

Access to the TTMRA Guide here.

Read more

3. General Aviation can safely grow by adopting FARs.

General aviation is a lot more than private owners. It is all operators, organisations and individuals outside the major airline system, including design, manufacturing and maintenance. Under the FAR system, all aircraft maintenance requirements are specified in FAR 91.409 and US manufactured aircraft maintenance manuals are compliant with these regulations. The system has worked extremely well for many decades.

The USA general aviation provides the world safest system for this sector of aviation.

FAR Part 91 is the core of the operational USA regulations and, if you believe the CASA Parts map, CASA sees it as the core to all the operation regulations in Australia. Instead of adopting the FAR Part 91, as supported by general aviation for the last two decades, minority sector representation have politically demanded that CASA provide sector regulatory provisions be produced prior to making the core regulation. This means that many provisions included in Part 91 are being duplicated in these separate Parts instead of adopting less confusing regulatory provisions from FAR Part 91.

The core regulations for GA is FAR Parts 91 and 43, including a 'controlled" FBO system based on AC 150/5190-7 where FBO Specialised Service Organisations could be registered on a CASA database.

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Basically, the implementation of CASR Part 66 failed to adopt all provisions of EASR Part 66 and Part 147, CASA applied a completely different system in Australia. If the national VET system qualifications were done properly, then all CASA would need to issue a licence/rating is evidence of the qualification plus evidence of meeting regulatory experience on working aircraft prior to issuing the AME licence. However, like EASA and FAA, more than one way must be retained to obtain a licence and that is where the NAA controlled examination system is required.

Both EASA & FAA enable experience plus self-study plus pass NAA examinations to obtain a licence.

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"The TTMRA is built upon, and is a natural extension of, the MRA. It represents a deepening of the Australia-New Zealand Closer Economic Relations Trade Agreement (ANZCERTA). The impetus for the TTMRA came from government recognition that there were regulatory impediments to trade between New Zealand and Australia These were often in the form of [-goods-] and different regulatory requirements for those wishing to practise in registered occupations.

The TTMRA helps to support a seamless trans-Tasman market by allowing for the free movement of goods and of people in registered occupations across the Tasman. The benefits of the TTMRA are particularly significant where regulatory differences mainly reflect national historical or institutional arrangements, rather than the objective assessment of risks to public health, safety and the environment.

The benefits of trade liberalisation under ANZCERTA **are unable to be fully realised until such impediments are reduced or removed.**

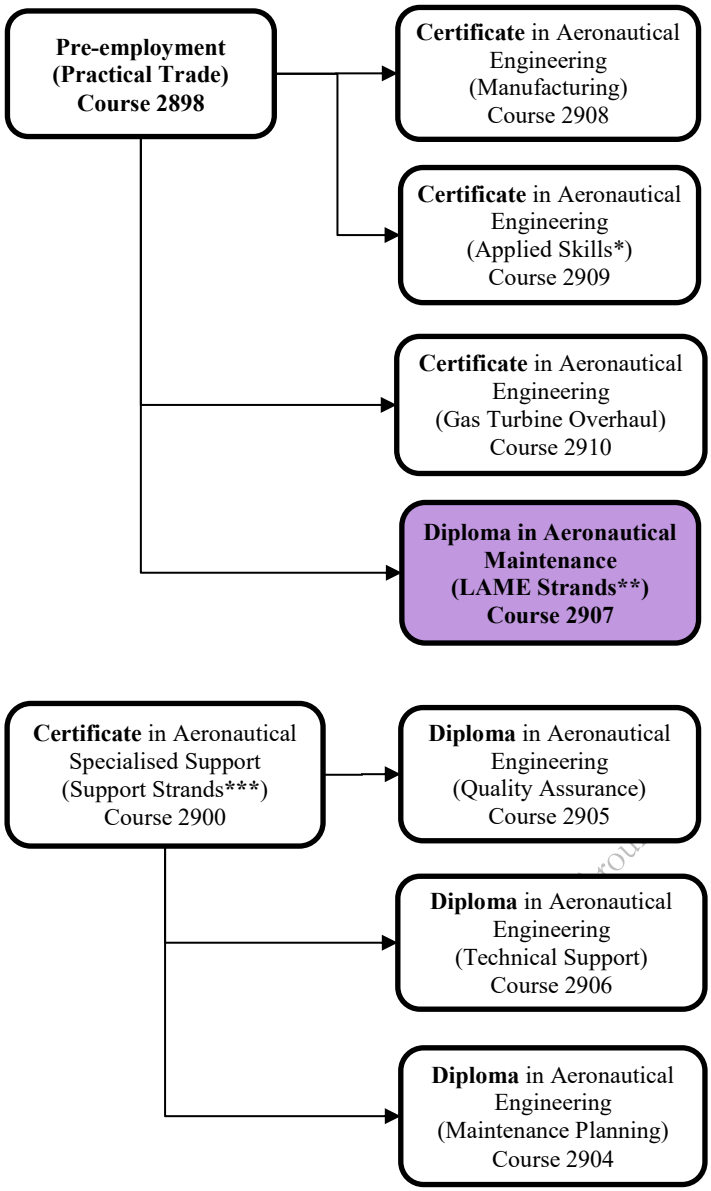
4.5 What is the role of occupational registration authorities?

It is the duty of occupational registration authorities across Australia and New Zealand to facilitate the operation of the MRA and the TTMRA, in particular, by using their ability to impose conditions on registration in such a way as to promote mutual recognition principles. All registration authorities are required to provide guidelines and information about the operation of the MRA and the TTMRA in relation to the occupations for which they are responsible.

In other words, the occupations of AME, LAMEs, workshop personnel, maintenance controllers, planners, etc., etc., should have minimal differences. CASA's predecessor was working closely with the CAA(NZ) in the early 1990s to achieve close harmonisation across Australasia that would have more compatible occupations in the engineering maintenance and manufacturing industries. NZ has a more integrated VET career paths beneficial to maintenance and manufacturing training system that the Australian VET system could benefit by copying. A basic outline follows, including Part 147 EASA approved course.

Our VET training is a long way short from providing these skills, only providing qualifications.

New Zealand Maintenance/Manufacturing VET Courses provide Career Pathways



* Applied Skills Strands "Includes Workshops" **Course 2909**	• Composites • NDT • Mechanical • Powerplant • Structures • Armament • Electrical Repair • Instrument Repair • Radio Repair • Avionic Maintenance • Rotorcraft
** LAME Strands **Course 2907**	*Mechanical* • Aeroplane • Rotorcraft • Powerplant Piston • Powerplant Turbine *Avionics* • Electrical • Instruments • Radio
*** Specialised Support Strands **Course 2900**	• GA Aircraft • Composites • Electroplating • Machining • NDT • A/C Furnishings & Equipment • Mechanical • Painting • Powerplant • Structures • Armament • Avionics • Rotorcraft

Additional Courses

Certificate in Aeronautical Engineering (Workplace Introductory Skills) Course 2901

Certificate in Aeronautical Engineering (Maintenance Control) Course 2911

Certificate in Aeronautical Storekeeping (Parts Handling & Tool Store) Course 2902

Certificate in Aeronautical Engineering (Production Control) Course 2899

Certificate in Aircraft Servicing Course 2903

Part 147
EASA Approved

Diploma in Aeronautical Engineering (European Regulations) Avionics & Mechanical Course 2133

Both manufacturing and maintenance, including maintenance control/planning are covered in the VET system. The great benefit is each course provides pathways to higher courses even if changing from trade to para professional management levels controlling production, maintenance and planning.

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FAR Part 91 is the core of the operational USA regulations and, if you believe the CASA Parts map, CASA sees it as the core to all the operation regulations in Australia. Instead of adopting the FAR Part 91, as supported by general aviation for the last two decades, minority sector representation have politically demanded that CASA provide sector regulatory provisions be produced prior to making the core regulation. This means that many provisions included in Part 91 are being duplicated in these separate Parts instead of adopting less confusing regulatory provisions from FAR Part 91.

The core regulations for GA is FAR Parts 91 and 43, including a 'controlled" FBO system based on AC 150/5190-7 where FBO Specialised Service Organisations could be registered on a CASA database.

Just reading the first 5 regulations of FAR Part 91 is enough to understand the practicality of FAR Part 91.

For example, the pilot must discontinue the flight when unairworthy mechanical, electrical, or structural conditions occur. This means the aircraft can have defects as long they are not airworthy defects.

Part 91 covers just about every sector of aviation that CASA has created red tape to administer.

§ 91.1. Applicability.

(a) Except as provided in paragraphs (b) and (c) of this section and §§ 91.701 and 91.703, this part prescribes rules governing the operation of aircraft (**other than moored balloons, kites, unmanned rockets, and unmanned free balloons, which are governed by part101 of this chapter, and ultralight vehicles operated in accordance with part 103 of this chapter**) within the United States, including the waters within 3 nautical miles of the U.S. coast.

*[**Ed**. 701: foreign civil aircraft within the United States. & 703: civil aircraft of U.S. registry outside of the United States]*

(b) Each person operating an aircraft in the airspace overlying the waters between 3 and 12 nautical miles from the coast of the United States must comply with §§ 91.1 through 91.21; §§ 91.101 through 91.143; §§ 91.151 through 91.159; §§ 91.167 through 91.193; § 91.203; § 91.205; §§ 91.209 through 91.217; § 91.221, § 91.225; §§ 91.303 through 91.319; §§ 91.323 through 91.327; § 91.605; § 91.609; §§ 91.703 through 91.715; and § 91.903.

(c) This part applies to each person on board an aircraft being operated under this part, unless otherwise specified.

(d) This part also establishes requirements for operators to take actions to support the continued airworthiness of each airplane.

§ 91.3. Responsibility and authority of the pilot in command.

(a) The pilot in command of an aircraft is directly responsible for, and is the final authority as to, the operation of that aircraft.

(b) In an in-flight emergency requiring immediate action, the pilot in command may deviate from any rule of this part to the extent required to meet that emergency.

(c) Each pilot in command who deviates from a rule under paragraph (b) of this section shall, upon the request of the Administrator, send a written report of that deviation to the Administrator.

§ 91.5. Pilot in command of aircraft requiring more than one required pilot.

No person may operate an aircraft that is type certificated for more than one required pilot flight crewmember unless the pilot in command meets the requirements of § 61.58 of this chapter.

§ 91.7. Civil aircraft airworthiness.

(a) No person may operate a civil aircraft unless it is in an airworthy condition.

(b) The pilot in command of a civil aircraft is responsible for determining whether that aircraft is in condition for safe flight. The pilot in command shall discontinue the flight when unairworthy mechanical, electrical, or structural conditions occur.

§ 91.9. Civil aircraft flight manual, marking, and placard requirements.

(a) Except as provided in paragraph (d) of this section, no person may operate a civil aircraft without complying with the operating limitations specified in the approved Airplane or Rotorcraft Flight Manual, markings, and placards, or as otherwise prescribed by the certificating authority of the country of registry.

(b) No person may operate a U.S.-registered civil aircraft—

(1) For which an Airplane or Rotorcraft Flight Manual is required by § 21.5of this chapter unless there is available in the aircraft a current, approved Airplane or Rotorcraft Flight Manual or the manual provided for in § 121.141(b); and

(2) For which an Airplane or Rotorcraft Flight Manual is not required by § 21.5 of this chapter, unless there is available in the aircraft a current approved Airplane or Rotorcraft Flight Manual, approved manual material, markings, and placards, or any combination thereof.

(c) No person may operate a U.S.-registered civil aircraft unless that aircraft is identified in accordance with part 45 of this chapter.

(d) Any person taking off or landing a helicopter certificated under part 29of this chapter at a heliport constructed over water may make such momentary flight as is necessary for takeoff or landing through the prohibited range of the limiting height-speed envelope established for the helicopter if that flight through the prohibited range takes place over water on which a safe ditching can be accomplished and if the helicopter is amphibious or is equipped with floats or other emergency flotation gear adequate to accomplish a safe emergency ditching on open water.

FAR Part 91, *Subpart E—Maintenance, Preventive Maintenance, and Alterations* spells out what and when maintenance is required for all aspects of general aviation and commercial aviation. It would reduce the complicated system in CAR/CASRs that are a mix of three regulatory systems. Adopting FAR Parts 43 and 91 would provide an environment for general aviation so it would be capable of growth.

CASR Part 91 adopted from the FARs would see a safer, less restrictive system than what we have today. We encourage AOPA and CASA to prioritise the making of Part 91.AOPA members want FAR Part 91.

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