

Growing General Aviation – Adopt the FARs

The freedom to fly is being buried in red tape and over-regulations – real reform please.

Disappointedly, the TAAAF members on CASA's Aviation Safety Advisory Panel do not represent AMROBA or the engineering disciplines of design, maintenance and manufacturing. In fact, they all have little expertise in these engineering disciplines.

Aviation reform can still happen if the Minister, Infrastructure and CASA become 'fair dinkum' and return to the original arrangement to adopt basically the FARs for GA operational and engineering disciplines. The FARs were selected because the majority of GA aircraft, private and commercial, registered in Australia hold FAA Type Certificates. Update CASR Part 21, adopt FAR Parts 43 and 91 as a minimum.

Australia has an international obligation to maintain the operation, airworthiness and maintenance of NAA type certificated aircraft in accordance with the requirements of the NAA responsible for type design.

*CASA's own Safety Standard states: **Safe flights use registered and certificated aircraft maintained by a qualified person flown by a qualified person in airspace controlled by a qualified person.***

When CASR Part 21 was made, based almost word for word on FAR Part 21, the first element of the FAR system was implemented. Without the provisions of FARs 43, 65 (IA), 91 & 135 being adopted as a minimum, maintaining the aircraft iaw a type certificate's airworthiness standards, will not happen until these FARs are adopted.

FAR Part 91 has many control provisions associated with keeping aircraft in an "airworthy" condition that is not in Australian legislation.

AMROBA has submitted detailed engineering reform requirements to CASA and these proposed regulatory changes do not need additional consultation. In the late 1990s it was decided to adopt the FAR system. In 2017 the CORE FAR regulations have not yet been made or kept harmonised. 20 years of failure to reform from the ground floor up.

Until the foundation and underpinning regulations are made, the CASA Suite of Regulations are incomplete and continue to apply lower standards than the FAR system.

General aviation aircraft are the largest sector of CASA registered aircraft and employs many personnel, especially in rural Australia. However, adopted and harmonised regulations with the FARs that were promised when reform started late in the 1990s have never been completely developed or made.

All the data/documentation to operate, maintain and keep FAA type certificated aircraft and/or components in compliance with their type certificate is contained in FARs, FAA ADs, Advisory Material and Manufacturers' operational and maintenance data. Adopt.

Airworthiness control/maintenance: FARs are safer, FARs standards are ICAO compliant, FARs are cost effective, FARs will reduce red tape and enables CASA to concentrate on regulatory oversight.

Let's Build the Engineering & GA Regulations Urgently

After 20 years, it is time to adopt safe, cost effective core regulations from the FARs

Why has GA been in disarray for decades?

- Because the ever changing regimes in CASA fail to adopt core GA regulations.
- Operations and airworthy/maintenance core regulations not completed.

What is the core flight operational regulation missing?

- Should have been the first regulation made - CASR Part 91.
- This Part was all but made in 2002 based on FAR Part 91.

Why, after two decades, hasn't it been made?

- Lack of leadership controlling the reform program.
- Too many sector lobbyists working against the making of core regulations.
- Many peripheral regulations have excessive requirements and red tape because the foundation core regulation is not made.

Will CASR Part 91, based on FAR Part 91, reduce costs?

- Reduce peripheral regulations and red tape, reduce costs to government and industry participants.
- Harmonises US manufacturers' documentation with regulatory requirements.
- Removes some of requirements in regulations already made.

FAR Part 91 has an excellent safety record

- Proven system – similar to NZ.
- Adoption of FAR Part 43 and the US FBO system missing from the NZ system.

Is there any confidence in CASA prioritising CASR Part 91 & 43?

- After 20 years, not much, the new Aviation Safety Advisory Panel membership is predisposed contrary to Engineering and GA Operations expertise.

Can GA & engineering be confident with continual regulatory reform?

- Probably not until we see a genuine GA and engineering directorates within CASA.
- Also they need to revamp ASAP so it has GA & Engineering representatives.

Engineering design can be fixed by replacing the current CASR Part 21, Subpart J with the EASA CS 21, Subpart J.

Keeping the rest of CASR Part 21 harmonised with FAR Part 21 fixes manufacturing.

- Adopting FAR Part 43 fixes all maintenance requirements.

Adopting EASR Parts 66/147 provisions, not adopted by CASA, amended to include CAR 31 Group ratings would basically fix AME licencing but not competence of other personnel.

- Will this new CASA regime adopt and make these regulations? **We hope so.**

Government/CASA must support these changes to create jobs
