



Engineering – Design - 2017

As of July this year we are still waiting the next step from CASA to implement the adoption of engineering regulatory changes to harmonise, streamlining and harmonising over complicated advisory material by adopting the same regulation harmonised with EASA CS Part 21, Subpart J but utilising the devolvement to approved design organisations (ADO) policies of the FAA.

The FAA regulatory function devolvement policy has more clarity and meets the broad industry from GA to AT sectors that our ADOs are currently involved in. Clarity is better than EASA.

What CASA and government fail to recognise is that Australian design companies are world class and some are actually recognised through strict supplier accreditation by major aircraft manufacturers and any differences in application of the regulatory and process requirements only adds unnecessary costs and loss of benefits for Australian businesses.

Design functions are important to all sectors of aviation operation and corrective action to harmonise with international standards can be simplified by adoption of EASA regulations and to use the devolvement of regulatory functions to ADOs in a similar manner that the FAA adopted for their ADOs.

The FAA recognises the EASA system but the FAA system and terminology is part of the current system under their Bilateral Aviation Safety Agreement with Australia/CASA.

The potential for design organisations to work cost-effectively within Australia and to participate in other regulatory systems cannot be restricted by unique regulatory and processes/procedures.

The Australian military system has already adopted the EASA CS Part 21, Subpart J and have made it a provision for contracted ADOs to have the same sort of civil approvals.

By adopting CS Part 21, Subpart J, both Australia's civil and military system will be harmonised. This harmonised approach will enable recognition from countries that have based their systems on either the EASA or FAA system.

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Safety All Around.

Regulatory Changes

Step 1. Full adoption, word for word as was done with adoption of FAR Part 21, with EASA CS Part 21, Subpart J. There is absolutely no reason why CASA cannot start this process today. If CASA was proactive they could complete and possibly have it tabled in Parliament this year.

Amplification: CASA, especially the sub-committee, has been aware of the need to amend CASR Part 21, Subpart J since last year.

The EASA system is the same as the FAA system in that it has the designer, certification verification engineer and the person responsible to release the design to service, lacking in our current CASR version.

By adopting the EASA wording, our civil design capabilities will have the same checks and balances that EASA and FAA have in their system, In addition, many Asian countries have either adopted the EASA or FAA system.

AMROBA has made formal submissions and we agree that the consultation and evidence is all available to CASA to start actions.

Step 2. Replace the current CASA advisory material and adopt the EASA advisory material. This is necessary to obtain harmonisation without adding unique provisions to address the whim of individuals.

Amplification: CASA has demonstrated since adoption of FAR Part 21 their inability to stay harmonised with adopted regulations. An inability to adopt the supporting processes and procedures when adopting other regulatory requirements ends up with unique and costly requirements in Australia. Most are not safety related as these unique provisions are not in the regulatory system being adopted.

Step 3: Implement the devolvement policy used by the FAA to empower their approved design organisations. Clarity is required to underpin the working arrangements of the BASA with the USA.

Amplification: The USA market is the world's biggest aviation market and currently Australia has a very important Agreement with them. To stay harmonised with engineering provisions is therefore very important and an overriding factor.

To adopt the same FAA devolvement of regulatory functions to ADOs in a similar manner will ensure supporting documentation for Australian products will utilise the same process as the FAA.

Summary: AMROBA, on behalf of its members and others, including the manufacturing organisations, call on CASA to make the regulatory changes to CASR Part 21, subpart J by adopting EASA CS Part 21, Subpart J.

Action not more words are required to make it happen