

AMROBA[®]inc

ADVOCATE OF THE AVIATION MRO INDUSTRY

<p>Newsletter Date 02/10/2014</p>	<p>GA AME Licence Proposal</p>	<p>Volume 11, Issue 10 October – 2014</p>
<p>What a paradox. CASR Part 66 licences, unlike their EASR counterpart, are very different to the proposal now contained in NPRM1310SS.</p> <p>To adopt the functions of the LAME as per ICAO Annex 1, Chapter 4 and EASRs, FARs and most other aviation regulatory systems, CASA must also recognise, in legislation, the role of the AME.</p> <p>The EASA system recognises that there are aircraft mechanics (AMEs) and that they perform maintenance tasks, including signing for those tasks.</p> <p>In addition, in aircraft base maintenance, a qualified AME can actually supervise others just like our NVET training qualifications provide.</p> <p>CAR Schedule 6 is based on ICAO Annex 1 LAME privileges but had added functions based on correcting safety issues over many years.</p> <p>Coordination of maintenance was introduced to ensure all maintenance was carried out because of the nature of aircraft maintenance in GA where more than one MRO or individual LAME may be involved with the aircraft's maintenance.</p> <p>Why was it introduced? To fix identified safety risks. Remove and will safety be compromised? Probably.</p> <p>Schedule 6 "stage" inspections is the implementation of an ICAO Annex 1 LAME privilege. Better explained in the old CAO from which it was adopted but lacks clarity of its meaning.</p> <p>Annex 1, Chapter 4: "the privileges of the holder of an aircraft maintenance licence shall be to certify the aircraft or parts of the aircraft as airworthy after an authorized repair, modification or installation of an engine, accessory, instrument, and/or item of equipment, and to sign a maintenance release following inspection, maintenance operations and/or routine servicing."</p> <p>Note the word "after" – this assumes that an unlicensed AME or a LAME performs and certifies maintenance tasks and the coordinating LAME certifies aircraft as airworthy at various stages and at the completion of maintenance. This philosophy must be retained in GA for GA to remain viable.</p> <p>When CAR 30 was made it referred to "qualified" personnel - the repealed CAOs had more clarity. The roles of AMEs and LAMEs were much clearer.</p> <p>If the proposed LAME NVET qualifications are to be recognised as the basis for the new GA licence and ratings, then the licence scope and privileges must be clarified in plain English.</p> <p>Scope</p> <p>The scope of this proposed AME licence needs to encapsulate the proposed NVET AQF qualifications specified in the NPRM. Like past CAR 31 AME licences, the scope of a particular licence must be very clearly explained. The proposed scope will create confusion and multiple interpretations.</p> <p>The clarity of the licence "scope" must be clearly defined to stop misinterpretation by LAMEs & the next generation of CASA field staff. The licence scope is based on qualifications from Part 147 MTOs. Qualifications should be the scope.</p> <p>Sadly, there is no "transitional" process explained in this proposal.</p> <p>Privileges</p> <p>GA needs CASA to retain the LAME certifying for stage inspections, to confirm an aircraft remains airworthy, and to sign maintenance releases; i.e. ICAO Annex 1 "privileges". These LAME certifications must be made at completion of maintenance. Schedule 6 makes it clear what the current LAME certifies.</p> <p>The CARs specify what the LAME is responsible for and these requirements were developed over many decades to address safety related issues. Coordination was introduced to enable multiple LAMEs/AMOs to be involved with the maintenance of aircraft. The coordination system removed many incidents of missed maintenance and diminished this real safety risk.</p> <p>The use of multiple LAMEs/AMOs is still needed in GA to address the shortage of specific LAMEs.</p> <p>Small Aircraft Definition</p> <p>CASR Part 135 is applicable to normal, commuter and transport category aeroplanes up to a maximum take-off weight of 8618 kg and a maximum passenger seat configuration of nine (9).</p> <p>Why not adopt a small aircraft LAME up to 8618Kg? These types of ratings were removed by CASA's predecessors before the formation of CAA/CASA.</p>		

Attracting & Retaining

AMROBA has made a presentation to the Federal Department of Education to adopt a more practical approach to educating people to support employer needs, especially aviation employers.

Our proposal is to encourage tertiary training post Year 10 so that the workforce obtains the skills to support employers by the time those more academically inclined reach year 12.

This is applied in some trades and professions but not so much in aviation even though there is a preference by government to use the NVET AQF qualification system for all jobs.

To make such a system work in aviation, the AQF qualifications must eventually be stated in aviation regulatory requirements for the various positions as other industries do so today.

The youth of today are interested in the qualifications required to obtain employment and if we do not have clarity in what qualifications are needed for particular jobs in our industry it is harder to attract new people into aviation.

CASA currently is applying these AQF qualifications to pilots and LAME streams. From a Federal funding perspective, the student numbers involved, at this stage, are small when compared to other industries.

In our industry we have those that must meet proficiency standards and those that must meet competency standards and those that must meet both.

Would a student recreational or private pilot need to meet any specific AQF qualification to become a VFR proficient pilot?

University	
Advanced Diploma	
Diploma	
Year 12	AQF 3/4
Year 11	AQF 2/3
Years 1 — 10	

Australia has a high cost system including from wages to government standards when compared to many countries in the India/Asia Pacific Region. With ever increasing free trade agreements being implemented in this region, the only way a high cost industry can survive if we are a lot more productive than our counterparts in this region.

The effects of high cost sectors is that they can price themselves out of a market or collapse a market. Australia is witnessing this phenomenon in many sectors, especially sectors like manufacturing businesses.

How do we attract new pilots and higher utilisation of current aircraft on the register?

The FAA is concerned that the average utilisation of GA aircraft is around 100 hours. We have an average GA utilisation of around 20 hours. How do we get owner/pilots back in the air?

Basically, unless an owner operates an aircraft in excess of 80 hours/annum, it is regarded as better to rent than own. We have many owners that operate below that amount of hours; these owners have reduced their flying hours for many reasons but costs associated with ever increasing red tape is one of the main reasons.

This government promised a reduction of red tape but obviously not yet in aviation.

A decade ago, there was some slight possibility that like aircraft would have like requirements applied to them. In a decade, there has been no change.

Until real reform to the aviation requirements are implemented based on the FAR system for GA, then you will not attract and retain the youth to this industry. The regulatory imposed splits in aviation do not work, neither do over prescriptive requirements.



MRO Structures



Why can't regulatory requirements mirror image business structures used in Australia instead of imposing unworkable structures on the industry. Manufacturing and maintenance service providers are under tremendous financial pressures and not recognising the AQF skill levels, that other government requirements impose on business, is hurting the aviation industry.

Basically, a small aircraft MRO personnel structure starts with a LAME, possibly an office administrator, who often doubles as procurement and stores control, and one other productive staff member. Once the LAME grows his/her small business they may employ an experienced AME or another LAME. At some stage in the growth, the MRO will consider employing an apprentice/trainee. As a small business expands, new skills like planners, managers, HR and other aspects are needed. Within this structure we have recognition of the various AQF levels required to underpin the skills being used.

As stated above, AQF level 2/3 are task related skills that need basic/limited supervision, whereas AQF Levels 3/4 can be expected to work unsupervised and, at level 4, even supervise others. Supervision should only be required where the person performing the task is unfamiliar with the task.

What AMROBA is lobbying for is the recognition in regulatory requirements for the various AQF levels.

Taxiing Permission Records

CASA provides the following advise for taxi authorisations under CASR Part 64. These authorisations are renewable every 5 years. An AMO will need procedures in their manual/exposition to cover this authorisation.

Aerodrome operators and AMOs will need to include a training program (may be on-the-job) that provides vehicle operators and maintenance personnel taxiing or towing aircraft with the level of training necessary so they are capable of operating safely on the airside of an aerodrome and avoid causing a runway incursion.

AMOs should also check with their insurance provider to ensure that their staff are covered with taxiing an aircraft.

There are legislative traps not highlighted by CASA.

CASA advice from their website:

How will I be assessed?

To gain a certificate of competency to taxi an aeroplane you must be assessed as competent against the standards specified in the Part 61 Manual of Standards for the relevant class or type of aeroplane.

What will my certificate include?

Your certificate of competency will state the class or type rating for the aeroplane you are authorised to taxi.

Your certificate will also include an issue date and must be signed by the person who granted the certificate.

If requested, you must present your certificate of competency to CASA for inspection.

How often do I need to be assessed?

Part 64 introduces competency checks for people who are authorised to taxi aeroplanes.

Competency checks are required every five years. So if you want to continue taxiing a class-rated or type-rated aeroplane, you need to have a current taxi certificate for that aeroplane class or type rating.

I hold a CAR 229 approval. Do I need to get a Part 64 certificate?

*CAR 229 approvals to taxi an aeroplane remained valid after **1 September 2014** unless they expired beforehand or were cancelled.*

*If your certificate was issued before **1 September 2009** you need to obtain a new certificate to taxi aeroplanes.*

CAR 229 certificates – like Part 64 certificates – can only be used for five years from when they were issued. So if your certificate was issued after 1 September 2009 you need to get a new certificate.

Although the authorisation is for a class and type of aeroplane, Part 64 imposes another requirement to have permission from the “operator” of the aeroplane. Who is the “operator”? Is it the registered operator, PiC or other operator? **WE HAVE ASKED CASA TO EXPLAIN.**

ICAO — **operator** means a person, organisation, or enterprise engaged in, or offering to engage in, an aircraft operation.

Global/State Aviation Safety

Regulation alone cannot improve the safety record.

The most important role of the law of aviation is to provide a framework that keeps the aviation industry safe, fair, and efficient.

Aviation safety is a term encompassing the theory, investigation, and categorisation of flight failures, and the prevention of such failures through regulation, education, and training. It can also be applied in the context of campaigns that inform the public as to the safety of air travel.

Though often viewed as a simple entity (the safety record, as it is called), safety is an extremely complex matter. It depends upon a dedicated and talented workforce.

ICAO Annex 19 comprises Standards and Recommended Practices (SARPs) related to the implementation of State safety programmes (SSP) and safety management systems (SMS), including provisions for the collection, analysis, protection and exchange of safety information. These requirements are essential to the successful evolution of a proactive safety strategy.

The underlined paragraph is the basis why the ASRR report recommended the philosophies of CASA needs to change and so does the aviation law to enable the new approach highlighted within Annex 19.

Maintenance personnel employed by airlines and aircraft maintenance organisations are required to perform their jobs in a manner that will result in a safe aircraft.

After approval for return to service the pilots, and other

flight crew members, are then expected to perform their duties with the ultimate goal of a safe journey for passengers.

Implementation of aviation safety requirements worldwide are varied. UN Regions: North America 93%; Europe 74%; Asia 69%; Latin America & Caribbean 67%; **Oceania 48%** & Africa 44%.

These are ICAO 2013 published figures.

Australia, like so many other countries, has an implementation record above the global average of 61 per cent.

Australia has 5 government agencies involved in cooperation programs in the Asia Pacific region, in particular with Indonesia and PNG. Department of Infrastructure, CASA, ATSB, ASA & AMSA cooperation and enhancement programs include training, mentoring, and capability building activities assisting the Pacific Aviation Safety Office.

ICAO will continue to progress safety-related projects **such as harmonization and recognition of approved maintenance organizations,** States’ responsibilities when a type certificate is suspended or revoked, and security sensitive airworthiness directives.

How can Australia participate in the Asia Pacific Region providing assistance when it continues to develop uniquely Australian aviation law? We are not harmonised.

Australia's unique aviation legislative maintenance requirements are **not compatible** with EASRs or FARs. No matter where you look, we are **out of step globally.**

* Become a Member *

The adage "there is strength in numbers" is absolutely true when it comes to influencing government regulations and policy. No one company, no matter how big or successful, can keep up on all the regulatory issues directly impacting businesses.

AMROBA is dedicated to serving the businesses that are responsible for the in-service continuing airworthiness of aircraft and aeronautical products, including the manufacture of replacement parts for in-service aircraft. This segment of the industry has never had a dedicated advocate until now.

AMROBA membership form is available from the AMROBA website: <http://amroba.org.au/become-a-member/>

print the membership form http://amroba.org.au/images/docs/AMROBA_Membership_Application.pdf



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Environmental Halon Use Review

AMROBA has been invited to participate in a review of Australia's Halon Management Strategy by the Department of Environment. Though halon is still the only certified product for aircraft use, collection and disposal of halon is important.

Halon is still used in aviation in locations such as: toilet extinguisher bottles (*halon 1301*), handheld fire extinguishers (*halon 1211*) engine and APU fire suppression systems (*halon 1301*) and cargo compartment fire suppression systems (*halon 1301*).

AMROBA is aware of ICAO Resolution A37/9 on halon replacement and there are also EU halon replacement timeframes for new aircraft certifications. Annex 6 establish requirements and timeframes for the use of halon alternative fire extinguishing agents.

ICAO agreed that fire extinguishing systems shall use fire extinguishing agents that are not listed in *Annex A, Group II of Montreal Protocol on Substances that Deplete the Ozone Layer*, specifically for the following applications and dates:

1. Toilet extinguishing systems for in-production aircraft no later than **31 December 2011**;
2. Handheld systems for in-production aircraft no later than **31 December 2016** (this date was chosen to allow adequate time to leapfrog high GWP alternatives for this application); and
3. Engine/Auxiliary Power Unit fire systems for new designed aircraft (defined within ICAO as aircraft types for which an application for a TC is submitted to the State of Design) on or after **31 December 2014**.

The problem is, these dates were set before minimum performance standards had been approved and where no suitable alternatives had yet been identified.

Therefore, all we can do is to continue with the current halon products until the designers and manufacturers develop satisfactory replacements.

Recycling of halon by the Australian National Halon Bank is needed to meet the immediate future requirements of the aviation system.

Returning halon to the Australian Halon Bank is important so Australia's halon stocks can be managed to ensure supplies of recycled halon are available for essential civilian uses until suitable alternatives are developed. There is no more new stocks of halon.

Halon is a major contributor to ozone depletion—we need to be involved.

The Government provides a free service for the general public and **small business** to dispose of fire extinguishers.

There is an application form that can be completed to be exempt from being charged for the disposal; must tick the small business box. [Exemption Form](#).

The National Halon Bank also operates a freecall service to advise you on disposal of halon. Call 1800 658 084 to arrange for the disposal of any unwanted halon product.

We hope our submission will remove the current impositions and need to hold specified competencies.

If you have any comments, please send them to amroba@amroba.org.au for collation into our submission.

The Aircraft Maintenance Engineers/Technician Creed

Worth Remembering

"UPON MY HONOR I swear that I shall hold in sacred trust the rights and privileges conferred upon me as a qualified aircraft maintenance engineer/technician. Knowing full well that the safety and lives of others are dependent upon my skill and judgment, I shall never knowingly subject others to risks which I would not be willing to assume for myself, or for those dear to me.

IN DISCHARGING this trust, I pledge myself never to undertake work or approve work which I feel to be beyond the limits of my knowledge nor shall I allow any non qualified superior to persuade me to approve aircraft or equipment as airworthy against my better judgment, nor shall I permit my judgment to be influenced by money or other personal gain, nor shall I pass as airworthy aircraft or equipment about which I am in doubt either as a result of direct inspection or uncertainty regarding the ability of others who have worked on it to accomplish their work satisfactorily.

I REALIZE the grave responsibility which is mine as a qualified aircraft maintenance engineer/technician, to exercise my judgment on the airworthiness of aircraft and equipment. I, therefore, pledge unyielding adherence to these precepts for the advancement of aviation and for the dignity of my vocation."