

AMROBA[®]inc

ADVOCATE OF THE AVIATION MRO INDUSTRY

Newsletter Date
3/12/2014

2015—Don't Expect Changes in GA

Volume 11, Issue 12
December – 2014

The economic and political environment that we are in will prevent the reforms that are highlighted in the ASRR recommendations being properly implemented.

At last, the CASA Board has been announced thus meeting another point of the government's aviation policy.

The government has also endorsed most of the ASRR recommendations.

However, the Federal government is being very conservative in making decisions, especially now elections and polls are working against them.

It is recognised by all participants in aviation that aviation is over-regulated even when compared to Europe. GA is way over-regulated when compared to America, NZ and the ICAO SARPs.

Until regulatory imposed costs have been drastically reduced to enable young people to obtain pilot licences, then GA will languish. There are other costs associated with all training that needs to be contained.

Today, commercial jobs in GA for young pilots are few and far between. Private use of aircraft is too costly.

The private use of non-transport aircraft is declining but controlling 'gophers' are doing what their leaders direct which is not in the best interest of a safe and viable GA industry. Safe but no one is flying.

Since the beginning of the CAA/CASA era, post the Department moving from Melbourne, GA has become more regulated and increasingly hit with more and more costs.

Until government reviews the Civil Aviation Act, CASA will continue to have the same approach as now.

9A Performance of functions

(1) *In exercising its powers and performing its functions, CASA **must regard the safety of air navigation as the most important consideration.***

(2) *Subject to subsection (1), CASA must exercise its powers and perform its functions in a manner that ensures that, as far as is practicable, **the environment is protected from:***

(a) ***the effects of the operation and use of aircraft;** and*

(b) ***the effects associated with the operation and use of aircraft.***

And, the main object of the Act makes participants wonder whether their survival & jobs are ever considered.

3A Main object of this Act

*The main object of this Act is to establish a regulatory framework for **maintaining, enhancing and promoting the safety of civil aviation, with particular emphasis on preventing aviation accidents and incidents.***

With that anchor around your neck, the new CASA Board and DAS Skidmore are fairly restricted.

Change must come eventually but when? Next election?

Basically, the view of Parliament is that a regulatory framework that prevents aviation accidents, incidents and making no effect on the environment is the main reason for developing aviation regulations.

Until we have a Parliament that has a priority to develop Australian jobs and de-regulate GA to the same level as the ICAO SARPs, USA and even NZ, then sensible, workable regulatory reforms will not happen.

The ASRR Report, prepared by a Canadian, Englishman and an Australian, after consultation, gives some hope.

The foundations for job growth in general aviation and charter sectors is about enabling those that hold licences, delegations or authorisations issued by CASA to hold the same responsibilities as they hold in the USA FAR system.

To enable the creation of jobs, it is pressing that Australia's future [aviation/aerospace] regulatory system must be completed within 2 years based on ASRR principles; using performance-based regulations (PBR), supported by all aviation safety compliance requirements documented in regulations/standards that receive Parliamentary scrutiny. That is, a return to "**rule-of-law**" principles.

Another reason that 2015 will not see any changes is that there is still no Ministerial Strategic Direction yet written to the CASA Board and CASA itself.

There are many jobs that can be created, especially in regional Australia, not only directly in aviation but in other associated activities, if the government's strategic direction includes the ASRR & red tape reduction program.

The Minister's strategic direction must require Australia & New Zealand to have common Australasian aviation standards, to enable better trade within a single aviation market. New Zealand aviation regulatory development is years ahead of Australia's regulatory development.

Immediate adoption of the FAA system for GA, in a like manner as has been done in New Zealand, will see investment in GA because of long term certainty.

The longer government, government departments & its agencies procrastinates over aviation the longer it will be before positive action is taken to stabilise rural Australia.

A positive is the Department sets policy, Board will direct CASA, Government supports most of the ASRR Report.

However, a badly structured Civil Aviation Act is still fundamentally what is wrong with the current system.

The Act really needs to be totally reviewed, compared with the NZ Act, to provide the framework for a mature and respected CASA and a legislative framework that will produce a regulatory framework that works.

MOTTO: SAFETY ALL AROUND

GA needs AMEs with Industry Wide Skills

30 years ago, the apprenticeship system in Australia produced an industry wide skilled workforce that met ICAO Annex 1 requirements. At that time, the Department of Aviation promulgated the ICAO AME training syllabi and the apprenticeship system adopted these syllabi to produce tradespersons with industry wide skills.

20 years ago, government moved the Department's Head Office to Canberra, but not the staff who left, and then created the CAA. At that time of change the Department/CAA decided to no longer promulgate the ICAO AME syllabi even though they chaired the development of the next ICAO AME Training Manual under the misguided understanding that it only applied to LAME training.

This meant business-centric apprenticeship training became the norm. This is the reason why Australian AMEs are no longer recognised overseas, it is not the licence issued by CASA.

Though many thought business-centric was a good idea at the time, the long term effect has seen a decline in young people wanting to work in aviation.

What is more troublesome is the ease that CASA has in not adopting ICAO SARPs in all but pilot licensing.

Under the ICAO Standards, the subject matter is defined in Annex 1. The inexperienced simply state this only applies to LAMEs.

Unlike the Department that understood, especially in GA, that AMEs and LAMEs changed employment regularly, CASA applies Annex 1 to the LAME only.

Foolhardy and short-sighted. The Department knew that for the industry to retain AMEs they would need industry wide skills so the AME or LAME had the flexibility to obtain employment anywhere in the aviation industry GA or airlines.

It was not uncommon for GA to be deprived of its AMEs & LAMEs when airline growth was high, and vice-versa, especially when airlines upgraded with newer aircraft requiring less AMEs/LAMEs.

This interchangeability was all possible when industry wide skills were the basis of each State's apprenticeship system. In addition, most airlines were transitioning from piston engine to turbine powered aircraft so airlines did not object to the broader skills.

Airlines using full turbine powered aircraft changed their AME training requirements. State apprenticeship systems became business-centric and that resulted in the loss of industry wide skilled workforce.

This has contributed to the loss from the industry of many AMEs as they change jobs because of the ups & downs of aviation. This has been evident in the creation of the "mechatronic" training streams by Manufacturing Skills Australia. The mechatronic stream is a return towards an industry wide skilled workforce.

There is clearly major differences between the Transport (airlines) Part 66 licences and the Non-Transport (GA) Part 66 licences.

The "government/CASA" experiment over the last 20 years of packaging training to meet CASA licensing requirements has been very detrimental to the provision of a workforce with industry wide skills.

Business centric skills is a contributing factor restricting the retention of AMEs/LAMEs in aviation.

Even EASA was smart enough to prescribe industry wide standards for skilling the workforce. The FAA A&P formal training courses are industry wide skills. Once again, Australia implements a unique approach that is not a global standard.

EASA Part 66 also enables the self study that we had.

Training Packages

ICAO AME Training Manual, Doc 7192 AN/857, Part D-1, 2nd Edition, is very specific so one wonders why a national training package needs to be developed by anyone else than the training establishment.

The Foreword to the ICAO manual states:

"The format of the manual reflects the concept of competency-based training and is now consistent with other manuals in the Doc 7192 series. Subject matter that must be addressed during the 3 phases of training is indicated in 1.5 — Training reference guide and the associated Appendix 1 to Chapter 1, which outline the approximate duration of the course and the level of expertise required in each subject."

Already structured for competency based training!!

Of real concern is that this manual states details for training requirements that "are not all-inclusive and are provided as the minimum requirements" used in the training of AMEs. We don't meet these minimum standards now.

ICAO Doc 9401, **Manual on Establishment and Operation of Aviation Training Centres**. There are about 11 Training Centres in Australia, none of which covers the training requirements of Doc 7192, Part D-1.

Why hasn't Australia any ICAO registered training centres for AMEs/LAMEs?

Search ICAO Database for Aussie Training Centres.

www.icao.int/Training/atd/Pages/SearchSchool.aspx

Registered Operator & ICAO

Safety relies on clarity.

After 25 years of regulatory development, the aviation regulatory system is a basket case. If private industry had such a business system it would fail.

A simplified system is needed in the interest of safety at all levels, especially for aircraft owners and operators (CASA's registered operators).

Internationally, ICAO states the aircraft's registered operator (RO) is responsible to keep their aircraft airworthy whilst on a civil register.

ICAO Part I: AT — Operators shall ensure that, iaw procedures acceptable to NAA (CASA), each aeroplane they operate is maintained in an airworthy condition.

ICAO Part II: GA — The owner of an aeroplane, or in the case where it is leased, the lessee, shall ensure that the aeroplane is maintained in an airworthy condition;

ICAO Part III: Helicopters — The operator shall ensure each helicopter they operate is maintained an airworthy condition.

The registered operator is to have their aircraft maintained in an airworthy condition is quite different to having a responsibility for the airworthiness of the aircraft.

Annex 8 permits a temporary loss of airworthiness:

3.5 Temporary loss of airworthiness

Any failure to maintain an aircraft in an airworthy condition as defined by the appropriate airworthiness requirements shall render the aircraft ineligible for operation until the aircraft is restored to an airworthy condition.

This simply states that the aircraft cannot be flown unless it is airworthy and serviceable.

However, Annex 8 specifies the following for the registered operators:

4.2.3. (c) develop or adopt requirements to ensure the continuing airworthiness of the aircraft during its service life, including requirements to ensure that the aircraft:

- i) continues to comply with the appropriate airworthiness requirements after a modification, a repair or the installation of a replacement part; and*
- ii) is maintained in an airworthy condition and in compliance with the maintenance requirements of Annex 6, and where applicable, Parts III, IV and V of this Annex;*

Item (i) above is met by a "stage" or "final" inspection by a LAME after the work is completed.

Item (ii) requires the RO to have maintenance done when required and it is the LAME/AMO that is responsible to perform that maintenance iaw the appropriate airworthiness standards.

The FARs provide performance rules, CAR/CASRs don't.

43.13 (b) Each person [AME/LAME/PiC] maintaining or altering, or performing preventive maintenance, shall do that work in such a manner and use materials of such a quality, that the condition of the aircraft, airframe, aircraft engine, propeller, or appliance worked on will be at least equal to its original or properly altered condition (with regard to aerodynamic function, structural strength, resistance to vibration and deterioration, and other qualities affecting airworthiness).

Every registered operator would feel confident if this FAR performance rule applied to CASRs. GA needs its own CASR Part 43 for non-airline ops based on the FAR and the NZ Part 43.

It is time owners politically lobby hard for the adoption of the FAR/NZ GA rules—they work.

What is a "Signature"?

There are many provisions in regulations requiring a signature. For example, in Schedule 6 to CAR 1988, 'signature' includes licence number & date.

A signature is generally understood to mean the signing of a written document with one's own hand, however, it can also be a 'mark' or it can be an electronic or digital signature under the following:

Electronic Transactions Act 1999

(a) in all cases—a method is used to identify the person and to indicate the person's intention in respect of the information communicated; and

(b) in all cases—the method used was either:

(i) as reliable as appropriate for the purpose for which the electronic communication was generated or communicated, in the light of all the circumstances, including any relevant agreement; or

(ii) proven in fact to have fulfilled the functions described in paragraph (a), by itself or together with further evidence; and

Though CASA does not ask for a copy of an employee's signature to be kept, in today's litigious society it makes good sense to keep a register of appointed persons the scope of the company authorisation.

In addition to a copy of the signature, it is strongly recommended that a copy of the person's initials are also kept in the register.

There is good reason why a business should keep such data and that relates to evidentiary documents if ever there is more than a CASA inquiry. This can always be a possibility to aviation.

Worksheets maintenance tasks are quite often initialled as completed with the stage of maintenance using a full signature, licence number and date.

The AMO company procedures manual should stipulate that individual tasks may be initialled on completion whilst stage and final certifications have full signatures that include licence number & date.

The manual should also identify if written, electronic or digital signatures are used.

Remember, the real reason for company procedures manuals is to provide guidance to the staff how the company safety culture is met as well as compliance.

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



**AVIATION MAINTENANCE
REPAIR & OVERHAUL
BUSINESS ASSOCIATION, inc**



Postal Address:

**PO Box CP 443
Condell Park
NSW 2200**

Phone: 61 (0)2 9759 2715

Fax: 61 (0)2 9759 2025

Email:

amroba@amroba.org.au

inquiries@amroba.org.au

Website:

www.amroba.org.au

Why Was CASR Part 21 Made

Considering the paperwork that now exists, CASR Part 21 is failing the test of time as CASA continues to amend the Part away from the FAR system it was copied from.

After a decade, CASA has generated confusion between what is a APMA and what is an ASTC?

As we adopted these terms from the FAA, why has it become so confused.

The FAA state the difference between a PMA and a STC authorization can be understood as there is some similarities and some differences. The development process for getting an STC authorization is similar to a PMA development but the scope and scale of the effort is much greater.

Accordingly, the need for a STC typically comes when there is no product that meets a need. It's usually not a replacement part; it's a new concept. With the STC, a whole new realm of considerations must be included. How can we best design this product for safety, comfort, weight, installation, removal, and value?

Parts Manufacturer Approval "is an approval granted by the FAA to a manufacturer of aircraft parts. PMA-holding manufacturers are permitted to make replacement parts for aircraft, even though they may not have been the original manufacturer of the aircraft."

Replacement parts meet or exceed OEM design standards.

PMA is for a replacement part replacing a part with an equivalent part. The STC is a new design that will modify the aircraft's TC.

STCs change the design standard—this change may be major or minor as defined in CASR Part 21.

At times, a PMA holder will need to also hold a STC if the replacement part is to retro-fitted to other types and models from the original design.

For instance, an alternator approved under a PMA for specific aircraft models would need an STC if the alternator is a modification to the design of other aircraft and/or models.

The FAA state that parts approved by TSOA or PMA, part conformity will not be necessary for its use in a STC or TC certification project.

FAA State: "An STC approves the design and installation of modification articles in products. A subsequent PMA approves the production of these modification articles."

So why does CASA make it so confusing and different from the system Australia adopted.

A STC should not issued unless the PMA approval is also issued.

Changing the process will endanger the BASA with America and the FAA/CASA Agreement.

Time for government to cut the red tape and growing bureaucracy.

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."