

AMROBA[®]inc

ADVOCATE OF THE AVIATION MRO INDUSTRY

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CASR 21—J

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CASR Part 21, Subpart J was not supported by many “authorised persons” who quite rightly saw it as an attempt to remove the individual “authorised person” and replace it with an organisational approval at added costs.

In October 2014, CASA stated at a Certification Sub-committee meeting that “21J and 21M instruments of appointment can coexist”.

The CASA Sub Part 21J Briefing Note stated: *“The proposed Subpart 21.J of the CASRs will replace the current authorised persons’ scheme with organisational approvals.”*

The need for Subpart J was never consulted by CASA as previous consultation had been to adopt the FAR Part 183 approach. When CASA was questioned at a sub-committee meeting it was simply told that it was CASA management policy. “Collaborative consultation”!!!

This change in itself would, and has added costs to the maintenance of aircraft as what was previously available as “field repairs” by competent “authorised persons” is removed.

The ASRR recommendation 15 supports independent “delegates & authorised persons”. ***“The Civil Aviation Safety Authority continues to provide appropriate indemnity to all industry personnel with delegations of authority.”***

ASRR Report 4.5.1 also stated: *As part of this collaborative approach to safety oversight, CASA may need to become more reliant on industry delegates to issue low-risk approvals on their behalf. In implementing such arrangements, CASA must continue to identify delegates, when they are making decisions on behalf of the regulator to ensure that they are able to carry out these functions with confidence and legal certainty.*

The panel notes that a number of reviews of the level and type of indemnity offered to delegates have been conducted or proposed in recent years. In the Panel’s view, it is essential that appropriate indemnity arrangements are in place for all industry delegates of CASA.

Anyone with common sense knows that the overheads of running an organisation has to be recovered, except CASA.

CASA stated in their Briefing Notes that *the proposed changes do not significantly affect the current industry practices and are an evolution of what already exists. These changes promote safety through a new systematic approachetc. Nonsense.*

In other words, industry’s lobbying and the government support for adopting the FAR system for certification in 1998 was to be overturned. Everyone knew that many in CASA did not support the FAR system.

However, CASA must have mislead the Office of Best Practice Regulations who “assessed the impact of the amendments as minor and that a RIS was not required.”

Industry itself was mislead in that the consultation draft did not include the most contentious and costly provision that was included in the sub-part when it was made.

CASR 21.269(5) did not exist in the consultation draft and adds about 30% to the costs of design approvals.

(5) For subregulation (4), independent checking of a design activity must:

(a) involve a comprehensive and systematic examination of the activity to evaluate the adequacy and accuracy of its assumptions, methodology, calculations and conclusions; and

(b) be carried out by an individual who:

(i) has the knowledge, experience and qualifications required by the organisation’s exposition for individuals carrying out the design activity; and

(ii) is not the individual who carried out the design activity for the organisation; and

(c) be thoroughly documented.

This is not the FAR system that industry wanted to follow, it is a CASA system that increases costs and is totally opposite of what this government demands. Reduce red tape and regulations—it is not safety.

International Training Standards

AMROBA's research clearly identifies that our aircraft maintenance engineer training is no longer up to same standards as other countries whose training meets international training standards.

What are "international training standards"?

Under the Convention, Australia has an obligation to "adopt international standards" unless they notify a difference.

Article 37 Adoption of international standards and procedure:

"Each contracting State undertakes to collaborate in securing the highest practicable degree of uniformity in regulations, standards, procedures, and organization in relation to aircraft, personnel, airways and auxiliary services in all matters in services which such uniformity will facilitate and improve air navigation."

ICAO's international training standards are promulgated by ICAO for aircraft maintenance engineer training in ICAO Training Manual (Doc 7192) Part D-1 — Aircraft Maintenance Technician/Engineer/Mechanic.

This document was reformatted in 2003 to support those countries that have competency based training.

In addition, ICAO also provides workshops for "course developers" so they can convert the ICAO training manuals into courses.

The following documents detailing how the international training standards promulgated by ICAO should be applied. ICAO documents and workshop information can be obtained from ICAO by contacting FLS:

- ICAO **Course Developers** Workshop
- ICAO **Training Managers** Workshop
- ICAO **Training Development Guidelines**
- ICAO **Training Managers Guidelines**
- ICAO **Instructor Development Programme**

If the ICAO international training standards were applied by the Department of Education, then the training must support the issue of AME licences by CASA.

If an Education Department professional "**course developer**" was skilled by ICAO to convert the ICAO training manual standards into an AME course then the AME would have comparable skills with their international counterparts.

AMROBA is meeting soon with the Federal Department of Education and has had confirmation from Minister Pyne and Asst Minister Senator Birmingham that they support adoption of international training standards to enable "*students to be better equipped to compete and win jobs both in Australia and abroad.*"

"Be part of global aviation community"

Benefits of ICAO Training Standards

Aviation AME licensing regulatory change has made a mess of the AQF training standards.

Research shows that AME training once met the ICAO guidelines but this was abandoned in the early 1980s.

If a person is trained to meet international training standards then they have a chance to work in the global aviation community.

It is not the AME CASA licence that is accepted or rejected internationally, it is the academic qualifications held by the AME.

Under the AQF system, AME training will provide qualified resources that can perform and certify maintenance tasks.

AME licencing should be based on the experience of those academically qualified.

Most AMEs, licenced or not, that have been employed overseas bring back to Australia experiences that they would never obtain in Australia.

AMEs completing a course and obtaining globally acceptable qualifications must be a priority of government and CASA.

We have very little confidence that CASA can see into the future but we do see ICAO confirming what is required for the "Next Generation of Aviation Professionals."

*The ICAO **NGAP Vision** is to have a global aviation community that has sufficient competent human resources to support a safe, secure and sustainable air transportation system.*

CASA Small Aircraft Licence

AMROBA has rejected CASA latest proposal to make a completely different AME licence.

CASA has demonstrated no vision for the future of AMEs and LAMEs and apprentices.

All industry wanted was for CASA to retain the 2 categories, B1 mechanical and B2 avionics, and add group ratings to these categories.

When will CASA listen to its own industry?

B1.1 limited to Group(s) (like CAR 31)

B1.2 limited to Group(s) (like CAR 31)

B1.3 limited to Group(s) (like CAR 31)

B1.4 limited to Group(s) (like CAR 31)

B2 limited to Group(s) (like CAR 31)

Now they propose a Part 66 Small Aircraft Licence separate from the B1 & B2.

If the Federal Government supports international training standards then we will return to the broad based industry training of the past. Licence ratings depends on experience. Even EASA has that right.

CASA has confused the role of the AME to perform maintenance and sign for maintenance tasks and the role of the LAME as specified in ICAO Annex 1, Chapter 4.

One wonders if CASA understands what the scope of an AME licence or rating means.

ICAO definition of a **Rating**: “An authorization entered on or associated with a licence and forming part thereof, stating **special conditions, privileges or limitations** pertaining to such licence.”

For example, a B1.1 with a group or specific type rating is a B1.1 limited to the ‘group’ or ‘specific type’ rating.

What CASA must do is to comply with Annex 1, 4.2.2.3: A Contracting State **shall** prescribe the scope of the privileges of the licence holder in terms of the complexity of the tasks to which the certification relates.

“**Shall**” is an ICAO standard that must be complied with.

CAO 100.90 did comply with this standard even though the licence ‘scope’ was incorrectly stated as “privileges”.

The ICAO privileges were specified in Schedule 6, CAR 1988.

This took some explaining during the first ICAO audit and a commitment was made to correct but, for one reason or another, the CAO was never amended.

CASA is a Licencing Authority

ICAO makes the assumption that a country's Licencing Authority has the following role.

Licensing Authority. *The Authority designated by a Contracting State as responsible for the licensing of personnel.*

Note.— *In the provisions of this Annex, the Licensing Authority is deemed to have been given the following responsibilities by the Contracting State:*

- a) *assessment of an applicant's qualifications to hold a licence or rating;*
- b) *issue and endorsement of licences and ratings;*
- c) *designation and authorization of approved persons;*
- d) *approval of training courses;*
- e) *approval of the use of flight simulation training devices and authorization for their use in gaining the experience or in demonstrating the skill required for the issue of a licence or rating; and*
- f) *validation of licences issued by other NAAs.*

ICAO Ratings, e.g. category, class, type of aircraft, airframe, aerodrome control, etc.

ICAO places the responsibility on the government to educate the aircraft maintenance engineer, this is a responsibility of the Education Department.

It is time for the Education Department to take responsibility for providing academic qualifications acceptable to the global aviation community accepted by CASA.

It is time that CASA adopt a fully compliant AME licence with ratings and prescribes the scope of the licence and/or rating in a MoS.

This can be done by simply converting the old “privileges” into the “scope” of the AME licence ratings.

Adopt the ICAO Annex 1, Chapter 4 LAME privileges like other NAAs.

*** 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: amroba.org.au/become_a_member, or print the membership form amroba.org.au/print_a_form

Fees are stated on the application forms — BSB preferred method.

Nil-Hour VH Aircraft

Based on BITRE Statistical Reports up to 2012, there is an unmistakable trend. More and more privately owned VH aircraft fly Nil-Hours each year.

Nil flying VH-aircraft—Total number of VH-aircraft in GA and regional fleet. Data provided by BITRE.

2012: 2886 12430 23% of this fleet are not flying this year

2011: 2659 12725 21% etc.

2010: 2538 12564 20% etc.

We are of the opinion that the trend towards nil-hours will increase over 2013, 2014 and this year as more aircraft are mothballed in the private category.

The BITRE table below from the 2012 GA Activity Survey shows noticeable increases from the last survey.

In 2002, 270.2K hours were flown in private aviation.

In 2012, 232.6K hours were flown with more registered a/c.

Table A Reasons for nil flying activity (2012)

Reason for nil activity	Number of aircraft	Percentage of reporting inactive aircraft
Repair / maintenance / restoration	1 092	40.1
Aircraft in storage	376	13.8
Aircraft unserviceable / unairworthy	178	6.5
Work or other commitments	129	4.7
Aircraft awaiting sale	124	4.6
Amateur-built aircraft not yet completed	116	4.3
Owner's health issues / deceased	99	3.6
Financial reasons	83	3.0
Lack of business / company ceased operating	76	2.8
C of A not yet issued	56	2.1
Sold prior to 1 January 2012	51	1.9
New aircraft not flown during the survey period	43	1.6
Aircraft awaiting parts or modification	32	1.2
Operator or owner travelling	28	1.0
All other reasons	239	8.8
Total	2 722	100.0

Note: This table covers aircraft with zero hours reported and not those with reduced hours for any of the above reasons (for example, drought).



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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.”