

AMROBA GA ISSUES & SOLUTIONS

The following issues and proposed solutions are intended to keep GA alive and will only happen if CASA reduces its micro-management of industry. In addition, it is felt by participants of this meeting, if CASA does not take corrective action prior to the making of the proposed new regulations then the maintenance industry will, based on CASA implementation of CASR Parts 21-35, be reduced to a level where it will take decades to recover if it is at all possible.

| Issue | Impacts | Proposed Solution |
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| <p>1. Standardisation</p> <p>major-major issue</p> <p>Worse now than 12 months ago and getting progressively worse</p> <p>No improvement has been seen by industry in the last decade</p> <p>Industry is decreasing in numbers because there is an uneven playing field</p> <p>Also see issue 9</p> | <p>Industry's perception is that they deal with 5 "Nations" each with at least 5 "States" all with their own version of the "Safety Regulations". Industry "needs" a copy of each "Nation's" different "State's" Application Rules so that they can operate in an ever changing environment. Each "State" has their own way of implementing legislation. (Some rules industry is being forced to follow do not exist in the Commonwealth's Rules - cannot be found in print form promulgated by Government/CASA.) Industry believes that the differences in application across Australia has never been wider than today. These variations in application are impacting on businesses in a economic sense and are very costly</p> <p>Variation in approvals held by like MRO businesses are seen as CASA imposed trade restrictive practices on individual businesses. Some companies are being made to meet higher standards than their competitors.</p> <p>CASA's current non-standardised approach is slowly but surely closing industry down.</p> <p>CASA is not providing industry MRO businesses with a level playing field.</p> | <p>CASA to utilise industry representative associations to develop national policy/interpretation prior to implementation and application.</p> <p>CASA to adopt CASR Part 145 policy of broad written certificates with scope of work to be managed by the business - not CASA. e.g. CAR 30 certificate issued as CAR 30 specifies. (e.g. maintenance of aircraft) without any prescriptive limitations.</p> <p>CAR 30 certificates to have a condition that the organisation maintains an "Activity List" specifying the kinds of work being carried out (i.e. mirror image Part 145 proposed requirements)</p> <p>CASA to remove all restrictions that does not provide a level playing field for MRO companies.</p> <p>CASA to survey the industry to regulatory requirements not the more restrictive practices implemented and documented by an organisation.</p> <p>CASA not to issue NCN/RCA's or Observations unless the finding is against a regulatory requirement.</p> <p>Delete current practice of issuing NCN/RCA's against an organisation manual when the item in the manual is more restrictive or a matter not documented as a regulatory requirement..</p> <p>CASA's role should be monitoring to regulatory standards</p> |

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| <p>2. Increasing paperwork is forcing people to find other employment Killing the industry</p> | <p>GA is (was) a fairly simple industry that is made difficult by CASA's application of the rules CASA answer to everything is more documentation Does paperwork add to safety??</p> | <p>CASA adopt Government policy of removing all unnecessary paperwork for small business. Small business to be recognised as 20 or less employees same as Taxation and all other government policies. CASA to work with representative associations on a program to reduce paperwork & costs.</p> |
| <p>3. Australia's aviation is being isolated from the rest of the World.</p> | <p>Since the proposal to make regulatory changes have been programmed within Australia, industry has suffered a gradual down-turn and almost total loss of international markets. CASA must take credit for the global loss of creditability of the Australian aviation industry. Regulatory change has done nothing but damage the industry's international reputation. CASA's application of rules is seen as a negative impact on the industry.</p> | <p>There is an urgent need for Government and industry to review why Australia is being isolated from World markets. Under the SAM with NZ all restrictions between the two countries should be removed. Australian organisations should be able to employ and use NZ LAMEs. Amend current rules to accept an NZ LAME. Only needs the definition changed. (Note: NZ LAME is currently recognised in more countries than the Australian LAME.)</p> |
| <p>4. Replacement Parts</p> | <p>Local Manufacture - current process seen as destructive to current parts manufacturing industry. CASA has failed to listen to industry and have tried to enforce a method of compliance that will eventually shut the industry completely down. CASA does not have a responsibility to assist industry to comply. Australian manufactured parts are seen by industry as far superior to imported replacement parts. CASA fails to understand the difference in manufacture and assembly (cable/hoses)</p> | <p>A complete review of current CASA procedures and processes is needed to provide the assistance to a totally damaged industry. Industry does not see CASA "manufacturing" inspectors or engineers as peers by industry manufacturing personnel. CASA should assist, promote and foster this segment of industry.</p> |

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| 5. Imported Parts & Replacement Parts | <p>Supporting documentation should only provides traceability not original OEM paperwork. e.g. History cards or traceability to previous aircraft is sufficient.</p> <p>Onus is on installer not CASA "super" LAMEs acting as AWOs</p> <p>LAME (installer) takes responsibility for the part being fitted is authentic.</p> <p>Some CASA staff do not understand or recognise traceability documentation used globally.</p> <p>CASA do not understand when an ARC (or equivalent) can be obtained from foreign countries.</p> | <p>Leave the responsibility with the installer to ensure that replacement parts are authentic parts to be fitted. If the installer certifies for the fitment of a replacement part then the responsibility sits with the installer.</p> <p>CASA too often becomes involved (as a Super LAME) and overrides the installer's certification because they do not spend the same time researching the available data that the installer has researched prior to fitting a replacement part.</p> <p>Industry responsibility, not CASA.</p> |
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| <p>6. CASA Approach</p> | <p>CASA does not follow progressive enforcement action. Straight to "Show Cause" Enforcement action is based on known "flawed" rules and potential problems identified are not safety issues. Most are "legal" interpretation of a technical compliance deficiency. No attempt by CASA to assist industry to put in place corrective action. Industry perception is CASA has failed in its surveying and advising industry if they have to issue a "show cause" notice. Great concern with unsubstantiated errors (mainly observations) on internal CASA records CASA application is unique in the World, e.g. Not like NZ, etc CASA officers esteem and professionalism is way below their peers in industry. Impossible to "audit" their counterparts in industry when they are not a direct equivalent. CASA staff are not respected by their peers in industry because they are no longer seen as peers to industry qualifications standards CASA's record of providing safety regulation has been steadily decreasing the number of participants in this industry</p> | <p>CASA must return to safety monitoring, not compliance auditing to individual "interpretations". CASA survey to regulatory requirements only, not to a practice (variable) that is continually being changed by CASA individuals. CASA must change so that safety matters can be freely discussed between industry and CASA. CASA's current approach is creating an unsafe environment. CASA must "assist" industry to recover. Industry to "assist" CASA to recover.</p> |
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| <p>7. Regulatory Change</p> | <p>CASA seen as preempting future regulatory proposals rejected by industry Changes directed to current manual with no safety issue identified but based on what MAY be in future rules No current recognition of CAR 30 (internal) audits - will same apply in new rules Why can't CASA accept "internal" audits to alleviate depth of CASA surveillance - must be more cost effective if industry is voluntary complying Over audited if organisation uses a non-permanent employee to perform internal "audit" Reduction of CASA involvement in day-to-day operations if organisation has internal audit program. Transition must be cost negative - industry cannot absorb further costs GA are being prevented from operating in a same manner as like aircraft used by RAA.</p> | <p>Future rules must reduce CASA's involvement and paperwork if industry is to survive Industry can no longer afford CASA and their ever increasing costs. CASA must reduce costs to GA to a level similar to its competitors in RAA CASA has enabled a complete imbalance in basically the same type of aircraft operation. Dual pathway should have similar standards and costs.</p> |
| <p>8. CAR 30 Manual</p> | <p>Once manual accepted - no changes unless identified safety issue Procedures versus processes is not understood by CASA This is highly contentious - if CASA accepted why is it continually being directed to change when org has no safety problems that would justify a change. Complexity of manual is dependent on how safe the organisation is operating</p> | <p>If CASA promulgated methods of compliance are adopted by an organisation then no duplication of this data need to be included in the manual. Once a manual is approved CASA should not direct any change to that manual unless a proven safety issue has been recognised.</p> |

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| <p>9. Training of CASA AWIs</p> | <p>AWO lack creditability Should concentrate on monitoring safety/surveillance Stop "audit" functions - concentrate on survey function Most AWOs have no safety interest or knowledge Should take action based on identified safety issue only not the multitude of ASR and RCAs that are seen as a numbers game. AWOs must have like knowledge/experience to survey industry</p> | <p>If CASA cannot provide the appropriate training of its AWOs the AMROBA should work with CASA to identify the training needs of an AWO. CASA is seen as working to a "quota" system</p> |
| <p>9A. Training of industry</p> | <p>Industry feels the lack of ability to attract new participants relates directly to the training available within this industry. Training and licensing costs are too high when comparison is made with other modes of transport.</p> | <p>Take issue up DEST CASA should consider reducing examinations and acceptance of TAFE examinations. LAME GA ratings??? Review needed</p> |
| <p>10. Aircraft Maintenance</p> | <p>Parts removed and returned to same aircraft is aircraft maintenance "Work under arrangement" totally misunderstood</p> | <p>Education</p> |
| <p>11. CASA Media Releases</p> | <p>Must be careful not to give false impression of industry Media Releases are seen as a "boost" CASA not industry safety. Industry does not support many of the media releases because they are not seen as relevant to the industry. Most demonstrate that CASA has little understanding of what is actually happening in the industry.</p> | <p>Many releases have damaged the industry Affects the GA more than CASA realises. Promotional program needed to resurrect damage done to industry by Government/CASA very "public" actions. GA has been terminally damaged by Ansett and fuel fiasco.</p> |

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| <p>12. Mandatory by law versus mandatory by OEM</p> | <p>Regulatory mandatory is all CASA should monitor Industry standards should not be confused with regulatory mandatory requirements CASA should be taught what mandatory regulatory requirements are and promulgate clear requirements. TOO many interpretations being given by individual CASA AWOs.</p> | <p>Promulgate clear method of compliance with minimum mandatory requirements for Class B aircraft used privately. 100 hourly manufacturer or CASA maintenance schedule. ADs plus Airworthiness Limitations Amend current CAAP to remove current confusion in industry because of individual CASA AWO interpretations</p> |
| <p>13. AMROBA Role in Enforcement Action</p> | <p>Because CASA will not assist or provide advice on perceived compliance problems there is a role for the industry's business association to provide guidance and assistance to an organisation to comply voluntarily with the regulations. CASA is seen as no longer capable of providing assistance to an organisation to correct CASA requirements to correct deficiencies.</p> | <p>AMROBA & CASA senior staff to meet and research the possibility of business associations being involved in providing advice and guidance for organisation Remove CASA "shut em down" mentality</p> |
| <p>14. Complaints</p> | <p>Why not list complaints with DOTARS re CASA misjudgements Association only to submit complaints for review</p> | <p>DOTARS institute Complaints Process from industry representative associations. CASA handle individual complaints. DOTARS have power of review of CASA complaint process</p> |
| <p>15. AD/RAD/43 & 47</p> | <p>1986 introduced - many changes - original intent missed - Inst 8/9 conflict Need industry workshop - Address Not seen by industry as workable Sched 6 requires completion of maintenance to be certified or a stage of maintenance.</p> | <p>Arrange "specialist" industry group to word-smith ADs and propose corrective action.</p> |
| <p>16. AD/Eng/4</p> | <p>Promulgate industry advisory material as a method of compliance prior to cancelling AD</p> | <p>Urgent to permit piston engines to be on-condition in helicopters and aeroplanes.</p> |
| <p>17. CASA Maintenance Schedule</p> | <p>Seen as a good worksheet Why EIR aspects retained in new rules? Adopt international approach, areas to be inspected</p> | <p>Part 43 to refer to areas CASA Shed 5 is an option to comply</p> |

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| 18. AME licensing | Return to ICAO privileges LAME "quality control" provides conformance certification & return to service | Simplify costs Not require CASA to issue ratings where additional competencies gained through educational facilities (e.g. TAFE or aircraft/engine/etc manufacturers courses. Organisation responsibility to ensure employee trained. |
| 19. Certification of maintenance is different per individual AWO. | Victimisation "Satisfied" is not documented. Remove "satisfied" from legislation | Major Issue |
| 20. Airport Security | Current proposed security provisions will prevent introduction of flying to "new" participants. Need same standards as RAA Security appliances not legalised by CASA Will not prevent a real criminal Keystone cops approach Accept it is a political issue as other countries are downgrading their security level. | Review with DOTARS |

**GENERAL FEELING IS THAT GOVERNMENT AND CASA IS LEGISLATING GA INDUSTRY OUT OF EXISTENCE - BOTH RAA AND GA SHOULD BE ABLE TO COMPETE ON SAME LEVEL.
GA's SAFETY RECORD IS BETTER THAN RAA.
WHY IS PRIVATE AND AERIALWORK (INCLUDING FLYING TRAINING) SAFETY REGULATED DIFFERENTLY TO RAA
IF RAA TRAINING IS ACCEPTABLE (HOUR-TO-HOUR) THEN GA STANDARDS MUST BE NO MORE ONEROUS THAN RAA
WHY IS THERE A DIFFERENCE IN GETTING A CLEARANCE TO LEARN TO FLY IN GA & RAA**