CASR Part 66 PIR – Full Adoption

CASR Part 66 and Part 147 are not compatible with the NVET system, not ICAO compliant, and definitely not suitable for the Australian aviation MRO industry. The licencing system imposed is not appropriate for the non-airline sectors and replaced an effective AME licencing system. There is much that needs correction for the future needs of industry.

The ***Post Implementation Review*** (PIR) of CASR Part 66 must therefore be based on appropriate adoption of EASR Part 66 provisions that will enable Australian AME licences to once again exercise their ICAO LAME privileges. The licencing system must be applicable to the Australian aircraft fleet and industry, not the EU aircraft fleet. Four factors must be understood so that a licence system can properly function.

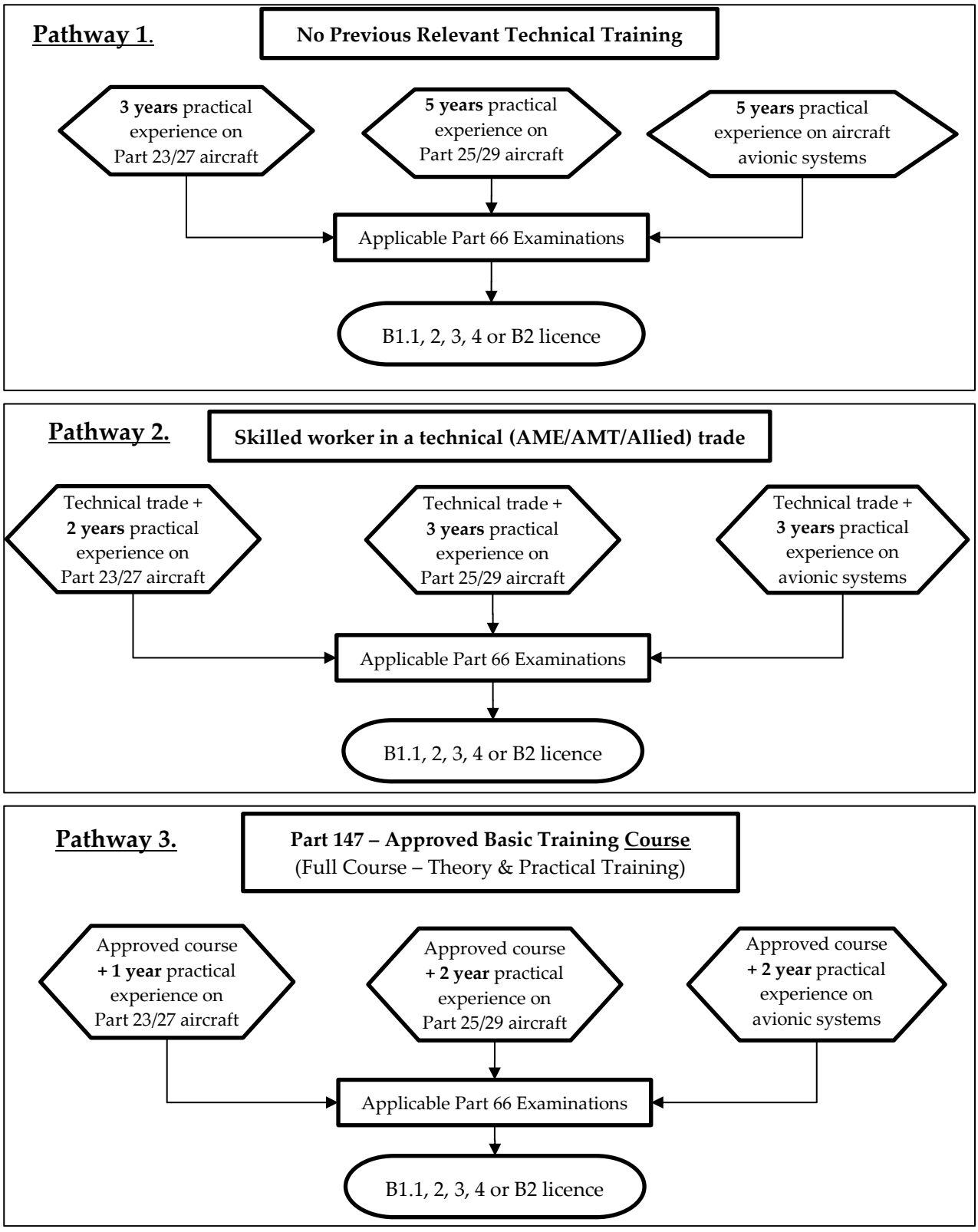
1. ***Licence Requirement:*** CASA, to match ICAO and EASR requirements, need confirmation that an AME has passed CASA knowledge examinations applicable to the licence/rating and, secondly, has met specified industry experience periods. Annex 1 sets the standards, EASR 66/147 is one application of those standards.
2. ***Licence Privileges:*** Specified in Annex 1, 4.2.2.1, the LAME privileges are to certify aircraft, or part of an aircraft, as airworthy (conformity/quality inspections), after maintenance has been completed by AMEs/AMTs, and to coordinate maintenance and sign the maintenance release post all maintenance being certified. These capabilities are the basis for having a licence system.
3. ***Licence Scope:*** This is not just what maintenance the LAME can perform, it is what kinds of work can be certified as airworthy and what kinds of maintenance can be coordinated by the LAME. The AME scope specifies what maintenance can be performed. This detail should be promulgated in 'Standards'.
4. ***Multiple Pathways:*** Why the EASR Part 66 system and the FAR system are workable is that they provide flexibility and multiple pathways to obtain a license as did the CAR 31 system and pre CAR 31 systems. All pathways require applicants for a licence to pass NAA controlled examinations appropriate to the licence sought.

We know that the EASA regulations are a compromise of all EU nations. The EASA system is not based on having a non-renewal certificate of airworthiness which requires continual airworthy inspections. Read Association News article: Airworthy Providers & Operators

There is no restriction on who may sit EASR Part 66 examinations. To apply for a licence the person needs to provide the evidence of the experience requirements depending on trade skills, or no trade skills, allied trade skills or airline maintenance experience.

The following flowcharts demonstrates the various EASR experience requirements obligatory for each licence, accepting the B1.1 to 1.4 and B2 licences. However they need to address the design standards so the LAME can certify the aircraft, aircraft system, or parts of the aircraft or system, as airworthy. i.e. meets design standards.

Pathway Flowcharts



The above EASR Pathways 1/2 were available under our previous system.

- Pathway 1 provides for self-study plus examinations. In Europe, this is the most common method and utilisation of on-line education providers are prominent. In Australia, very few utilised this for initial licence but was used for additional group ratings.

- Pathway 2 was the most common system used in Australia, complete an apprenticeship and apply to sit the CASA Basic examinations. Totally harmonised with EASR.
- Pathway 3 was not available in Australia but should now be available, especially as a post-secondary schooling full time tertiary course.
  - This is a "**course**" approval, not a RTO approval.

The above defines the flexibility of the EASR Part 66 system that adds a full time course that we did not have under CAR 31. Pathways 1 & 2 had always been available under the CARs. The underpinning requirement of Pathway 2 was an AME apprenticeship or an allied trade that provided the practical skills required. CASA applicable examinations must continue.

The following chart identifies EASA experience requirements in another licence category plus applicable examinations passed to be issued with another licence.

To: → From: ↓	*B1.1*	*B1.2*	*B1.3*	*B1.4*	*B2*
B1.1	-	*6 m*	*6 m*	*6 m*	*1 y*
B1.2	*2 y*	-	*2 y*	*6 m*	*2 y*
B1.3	*6 m*	*6 m*	-	*6 m*	*1 y*
B1.4	*2 y*	*6 m*	*2 y*	-	*2 y*
B2	*1 y*	*1 y*	*1 y*	*1 y*	-

NAA statement:

"The experience requirement will be reduced by 50 % if the applicant has completed an approved Part-147 course relevant to the subcategory."

This demonstrates how adopting the EASR Part 66 imposed cross licence category relies more on employment experience plus examinations to obtain an additional licence and/or group rating. Review of EASA/NAA application forms clarifies that it is employment history, not a schedule of experience that is used. The application forms include a signature from the Part 145 appropriate person confirming employment experience.

Another major provision to remove duplication

EASR Part 147.B.25 exempts a State Education RTO from the Part 147 approval.

EASR 147.B.25 was one of many provisions that were not adopted.

EASR 147.B.25 Exemptions

*(a) The competent authority **may exempt a State education department school** from:*

1. being an organisation as specified in 147.A.10.

2. having an accountable manager, subject to the limitation that the department appoint a senior person to manage the training organisation and such person has a budget sufficient to operate the organisation to the standard of Part-147.

*3. having recourse to the independent audit part of a quality system **[CASA/ASQA]** subject to the department operating an independent schools inspectorate to audit the maintenance training organisation at the frequency required by this Part.*

(b) All exemptions granted in accordance with Article 10(3) of the basic Regulation shall be recorded and retained by the competent authority.

THE COST EFFECTIVE PROVISIONS OF EASR PART 66/147 WERE NOT ADOPTED.

Missing Regulatory Elements

The adoption of EASR Part 66 was, at the best, incompetent. Privileges, etc. were incorrectly adopted and no consideration to LAME Annex 8 responsibilities were taken into consideration. We need to adopt the following EASR provisions, with minor changes to address the Australian GA fleet and clarify the process to certify as "airworthy".

- **EASR 66.A.20 Privileges.** Add clarity re Annex 8 privilege to certify as airworthy. This provision is needed to support the continual validity of the certificate of airworthiness. EASR covers the release to service privilege. ICAO Standards.
- **EASR 66.A.25 Basic Knowledge Requirements.** Adopt this provision to provide the clarity that the examinations are knowledge based and provided by CASA or an approved training organisation. E.g. Pathway 3 system.
- **EASR 66.A.30 Basic Experience Requirements.** Adopt the EASR standards – current system is providing licences to lower skills.
- **EASR 66.A.40 Continued validity of licence.** Adopt this standard as it maintains a database of LAMEs actually working in the industry. (5 year notification requirement)
- **EASR 66.A.45 Endorsement with Aircraft Ratings.** EASR is about licences and ratings, adopt.
    - Replace EASR Group rating system with CASA Group Ratings already agreed on with the aviation GA industry.
    - Adopt Group ratings up to 19 seats/5818 Kgs.
        - Adopt the CASR Part 23 (FAR/CS 23) new 19 seats/5818Kgs standard that has replaced 9 seats/5700Kgs. This increase certification standard commences from 2017 worldwide will provide AME licensing for the future and harmonise with the previous CAR 31 system that met the needs of GA.
- **EASR.A.50 Limitations**: More practical and simpler than Part 66 MoS. Adopt EASR.
- **EASR.A.70. Conversion Requirements**. This requires a complete review to reduce the costs.

The basis of the EASR Part 66 is applicant to meet experience requirements and passing the applicable [CASA] knowledge examinations to be issued with an AME licence/group rating.

- There are two international privileges that clarifies the role for the LAME and these need to be in CASR Part 66.

CAA(NZ), who use the FAA approach, introduced the A&P Inspection Authority into the system to clarify ICAO LAME privileges. They run IA courses that would be an ideal "course" to borrow as an interim transition provision.

Group Ratings: Another important element of the EASR system, is their "Group Rating" system that was not included in CASR Part 66. If this provision is adopted, all that needs to be done is a reference to the Australian "Group" ratings.

Basically, what was adopted was a modified Pathway 3. This was applied and replaced the national AME trade training system. This needs to be reversed so a new national AME trade training system, meeting international practical training standards, can be developed to underpin Pathway 2.

Summary

The basis of the AME licence is to provide conformity/quality inspection of stages of maintenance performed by the AME/AMT because Australia adopted the Annex 8 system of continual inspection to keep the certificate of airworthiness valid. This is different to the EASR system because, when Part 66 was introduced, some EU countries still had annual renewals of certificates of airworthiness.

CASR Part 66 demonstrated that CASA did not understand the "purpose" of the two ICAO privileges that apply to a LAME. A LAME, as an AME may perform maintenance but it is the LAME that performs inspections to confirm the validity of the certificate of airworthiness and to coordinate maintenance so they can sign the release to service.

ADOPTING the EASR system, with some changes as listed above, will bring back a workable system. The EASR system requires evidence of experience and passing the applicable CASA examinations. Same as CAR31.

These changes will enable a more cost effective system to be implemented with the introduction of education on-line knowledge providers to assist, in particular, a Pathway 1 person to pass the applicable licencing examinations.

Pathway 2 trade based system will enable a return to the previous successful system. Whether the trade training is VET Level 3, 4 or 5 should not be of any concern to CASA as long as the person can pass the applicable examinations.

The Aerospace IRC will determine the VET standards applicable to meet ICAO international training standards in compliance with treaty obligations.

The PIR and subsequent actions will ensure better skills and knowledge and return to an internationally recognised and respected AME licensing system.

Subsequent changes

EASR Part 147 also enables a 'State' Education System to be exempt from CASA approval as it has been for decades in Australia. EASR Part 147 must be drastically reviewed and full adoption of the EASR system, with minor changes to recognise the NVET system, will need to be actioned at the same time as the Part 66 PIR.

To ensure trade training meets international training standards, CASA must promulgate the ICAO syllabi for the avionics and mechanical training streams. This enables the Education Department's Aerospace Industry Reference Committees to develop training packages that meet the international training standards.

In addition, CASA must also adopt and specify the course duration as EASA has done. This will ensure that Pathway 3 will meet international standards.

The need for CASA to approve MTOs should be for purposes other than NVET provided trade training skills under Pathways 1 & 2. Pathway 3 is a course approval. CASR Part 147 should be used for training to obtain a licence rating, not for basic trade training though CASA should promulgate the ICAO training standards.

Ken Cannane

AMROBA

www.amroba.org.au

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