



1. Engineering Jobs on Hold Waiting for Public Servants Action.

Aviation engineering (design, manufacturing & maintenance) need harmonisation by adoption with EASRs (design) and FARs (manufacturing & maintenance), plus international/regional agreements to create jobs.

Instead of creating jobs now in the aviation engineering sectors, the regulatory and standards changes that are needed to harmonise globally, and will create jobs, are being painstakingly processed through an over-bureaucratic red tape system that keeps Australia lagging behind our progressive Asian neighbours. The more they delay changes to adopt EASA and FAA regulatory standards, the more public servants will continue to create red tape for current requirements that are not in these proposed adopted regulatory systems. It is not only within CASA, but it is also within the education system (see item 2).

Industry participants are witnessing a return to pre CASR days with the red tape continuing to be created. There are many businesses holding approvals from other NAAs so they can participate in the regional and global aviation markets. Others are working through a third party in a foreign country bypassing CASA as Australian approvals issued by CASA are not recognised in many countries.

Engineering regulatory changes are fairly straight forward, but will public servants working for CASA/DIRD adopt the same practices of EASA/FAA? Looking at increasing documentation that has come out over the last few years, there is little confidence throughout the industry that adopting the EASR or FAR will be implemented by CASA in the same manner as EASA or FAA.

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2. International Recognition of NVET Qualifications.

CASR Part 66, when introduced, should have meant a complete review of the national VET qualifications. When the Asia/Pacific region adopted the EASA Part 66 Aircraft Maintenance Engineer Licencing system, their education qualifications were totally remodelled to match the adopted separate licences.

The Asian nations that adopted EASR Part 66 also created education qualifications, e.g. “Aircraft Maintenance [&] Engineering” that underpins the issue of the mainly Part 66 B1.1/3 and B2 licencing system throughout the Asia/Pacific nations. The ‘field of study’ is “Aircraft Maintenance & Engineering”.

Though Asian countries still have slight differences in education qualifications, Australia is the odd country using ageing terminology that is not recognisable within this region and globally. As one Asian engineering executive stated, Australia has had “aircraft maintenance engineers” for years but support it with training packaged as “MEA Aeroskills” instead of a VET qualification titled “Aircraft Maintenance Engineering”.

The Asia/Pacific nations’ aviation MRO representatives are appealing for more harmonised “education qualifications” to enable the movement of qualified people within the region.

In particular, the need for workshop maintenance personnel VET qualifications need to be harmonised. New Zealand education qualifications are more specific and support various occupations in maintenance support organisations.

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3. Do Politicians Understand How Jobs Can Be Created In GA?

After five decades of being involved in the aviation MRO industry, it is sad to see this industry being segmented by regulatory imposed compartmentalised sectors. Segmenting has never worked to increase participation or jobs in this industry.

There was once a “principle” applied by government/CASA requiring a “parallel pathway” for CASA registered aircraft and non CASA registered aircraft operating under Self Administration Organisations.

What is missing from the general aviation system is the FAA “independent flight instructor” that Australia had a version of pre the creation of the CAA in 1988. Pilot shortages were recognised in the early 1990s.

Since the creation of CAA, industry stability and core fundamental regulations and standards have been in continual state of change. In addition, political direction has continually changed since the parliamentary review in the late 1980s.

Government kept telling us that changes adopted in the last couple of decades would create jobs.

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Asia/Pacific countries forecasted growth and actual growth is fast leaving Australia out of contention to participate without obtaining an Asian approval.

Why isn't there an Asian/Pacific BASA?

AMROBA has made a submission to the Aerospace IRC to change “MEA Aerospace” to globally recognised “Aircraft Maintenance & Engineering” as they did in Asian countries.

Thousands of jobs can be created by creating a system where stand-alone CASA approved flight instructors are more available to the GA system.

1. **Engineering Jobs on Hold Waiting for Public Servants Action.**

Aviation engineering (design, manufacturing & maintenance) need harmonisation by adoption with EASRs (design) and FARs (manufacturing & maintenance), plus international/regional government and/or CASA agreements to create jobs.

Instead of creating jobs now in the aviation engineering sectors, the regulatory and standards changes that are needed to harmonise globally, and will create jobs, are being painstakingly processed through an over-bureaucratic red tape system that keeps Australia lagging behind our progressive Asian neighbours. The more they delay changes to adopt EASA and FAA regulatory standards, the public servants will continue to create red tape for current requirements that are not in these proposed adopted regulatory systems. It is not only within CASA, but it also is within the education system.

Industry participants are witnessing a return to pre CASR days with the red tape continuing to be created. There are many businesses holding approvals from other NAAs so they can participate in the regional and global aviation markets. Others are working through a third party in a foreign country bypassing CASA as Australian approvals issued by CASA are not recognised in many countries.

Are we supporting, or, over regulating an industry to minimal involvement?

Engineering regulatory changes are fairly straight forward, but will public servants working for CASA/DIRD adopt the same practices of EASA or FAA? Looking at increasing documentation that has come out over the last few years, there is little confidence throughout the industry that adopting the EASR or FAR will be implemented by CASA in the same manner as EASA or FAA.

Many trying to participate in engineering sectors are continually frustrated at the differing approaches and direction regulatory reform has taken over the last two decades. The only direction that engineering sectors want CASA & government to take is to fulfil the international convention and adopt international standards. The signing of the BASA with the USA many years ago requires full adoption of, and continual harmonisation with, the FARs. The government did that in 1998 when CASR Parts 21-35 were made based on the FAR system. What government/CASA has failed to do is amend CASR Part 21 to adopt amendments made to FAR Part 21 since 1998.

CASA's current management recognises the need for these changes but are dealing with a bureaucratic process that takes too long to bring about the change.

Industry sees CASA as part of a total government system, so when aviation regulatory change happens, it also expects CASA to coordinate the effects of these changes with other government departments and agencies. In the recent past this has not happened as well as it could have.

A very important outcome of adopting and maintaining the FAR manufacturing, STC, PMA & TSO system is the international recognition and agreements that CASA can, and must, attain to create jobs. International agreements is crucial for the continual growth of the engineering design and manufacturing sectors in Australia. This requires CASA to be skilled in negotiating technical agreements for the benefit of our engineering organisations.

Many current businesses involved in design and manufacturing are also involved in our defence industry design and manufacturing contracts so keeping harmonised with world's best design and manufacturing regulatory systems is paramount for future contracts that result in Australian jobs.

The EASA design organisation and administrative requirements in EASR Part 21 Subpart J is urgent as it meets civil and defence requirements but must be adopted word for word and also the utilisation of AMC/GM.

CASA then needs to obtain technical agreements from as many Asia/Pacific nations as possible to open our design capability in the Asia/Pacific region. This will create jobs.

The FAA Part 21, excluding Subpart J and M, adoption will also require CASA to obtain, as a minimum, technical agreements with as many Asia/Pacific nations as possible to open our manufacturing capabilities in the Asia/Pacific Region. In addition, CASA has to also obtain recognition of the Part 21 approvals, Australia TC, STC, PMA, TSO, etc. with as many Asia/Pacific nations as possible. This will create jobs.

AMROBA fully encourages CASA current management to make the changes required, but we are also aware that the process to make change is so slow, industry has to continue to work within an ageing system that continually is applied differently by continually changing CASA middle managers and staff.

Patience is needed because CASA has lacked stability and their regulatory experience has been depleted.

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The Asian nations adopted EASR Part 66 and they also created education qualifications, e.g. “*Aircraft Maintenance [&] Engineering*” that underpins the issue of the mainly Part 66 B1.1/3 and B2 licencing system throughout the Asia/Pacific nations. The ‘field of study’ is “*Aircraft Maintenance & Engineering*”.

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Asia/Pacific nations’ aviation MRO representatives are appealing for more harmonised “education qualifications” to enable the movement of qualified people within the region.

In particular, the needs of workshop maintenance personnel VET qualifications need to be harmonised. New Zealand education qualifications are more specific and support various occupations in maintenance support organisations.

If CASAs PIR adopts the EASR Part 66 properly then the basis for an AME licence is passing the applicable module examinations that make up the modules for one of the five Part 66 AME licences. In addition, the only other regulatory aspect is the experience requirements. Acceptance of a VET qualification enables a reduction in experience requirements. Having a VET qualification based on a 75% examination pass mark may underpin the licencing requirements but doesn’t support the other occupations in the MRO industry.

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However, most businesses prefer employees to hold an education qualification under the VET system.

WH&S/OH&S requirements sets training and qualifications applicable to occupations.

It became clear at the recent Indonesian MRO conference that foreign education systems had been, or are being, developed to meet the many occupations within the aviation MRO industry.

AMROBA has made a submission to the *Aerospace Industry Reference Committee* to adopt the most common title of VET qualifications in the Asia/Pacific region. Change *MEA Aeroskills* to *AQF diplomas/certificates in Aircraft Maintenance and Engineering*.

It is time to have education qualification documents that actually describes the field of study applicable to the occupations in the MRO industry just like so many other countries.

Diploma/Certificate in Aircraft Maintenance & Engineering identifying the field of study just makes practical common-sense.

Clarifying such a qualification with the occupation (licence and non-licence occupations).

Component maintenance organisations requiring VET qualifications have been ignored for far too long. Many component workshops need deeper knowledge than what a LAME needs to maintain components on-wing so there is an urgent need to identify those occupations and specify the specific skills needed for the occupations. Australia does not need to start from nothing, it only needs to adopt the New Zealand VET system diploma and certificates that has already identified in their VET qualifications required for the occupations in the aircraft maintenance sector.

Education qualifications are generally defined in terms of the package or mix of competencies or learning outcomes required to meet an occupational job role.

Aviation, for some past reason, has never been made so employers can interpret what the person actually has been educated to what standards.

3. Do Politicians Understand How Jobs Can Be Created In GA?

Adopt the best regulations and practices from countries like the USA that have a comparable GA spread.

After five decades of being involved in the aviation MRO industry, it is sad to see this industry being segmented by regulatory imposed compartmentalised sectors. Segmenting has never worked to increase participation or jobs in this industry.

There was once a “*principle*” applied by government/CASA requiring a “*parallel pathway*” for CASA registered aircraft and non CASA registered aircraft operating under Self Administration Organisations.

What is missing from the general aviation system is the FAA “*independent flight instructor*” that Australia had a version of pre the creation of the CAA in 1988. Pilot shortages were recognised in the mid 1990s.

Since the creation of CAA, industry stability and core fundamental regulations and standards have been in continual state of change. In addition, political direction has continually changed since the parliamentary review in the late 1980s.

Asian politicians, on the other hand, are aware that aviation is a job creating industry if the right regulatory system is adopted. EASA concentrates on airline sectors whereas the FAA is a system covering all sectors of aviation.

At the recent Indonesian MRO conference, three government ministers spoke of their support and growth in aviation.

The economic reform that started in the late 1980s has been replaced by unique requirements that no longer apply in the major countries like North America and Europe.

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Most politicians are supportive of aviation but do not become involved because of the fear of safety being compromised.

If the FAA system for general aviation was adopted, then independent flight instructors, a fixed based operator system and the need for a LAME with the FAA Inspection Authorisation responsibilities, same as New Zealand, would see growth over time as independent flight instructors become available.

Many past independent flight instructors were retired airline pilots.

The capability for growth and job creation is available if the world best general aviation safety system is adopted.

Growth in the engineering disciplines of design, maintenance, manufacturing and training are waiting the adoption of the best international standards for safety and economics.

Political support is crucial to grow any industry in the current economic and environmental society applied by social media and politicians.

Most country members of governments have always shown support for aviation. However, as international experience has been depleted in CASA, the replacements with less experience are risk adverse instead of risk management that experienced public servants provided.