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NEWSLETTER

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1. Government's Purpose of Regulatory Reform.

When will aviation have proper regulatory reform that meets the PM's policy?

Department of Prime Minister: *"The challenge for any government is to deliver effective and efficient regulation and regulatory frameworks that impose the least necessary burden on businesses, community organisations and individuals in delivering economic and social outcomes.*

CASA does not comply with this policy and regularly include economic restrictions.

Recent changes to the Australian Government regulatory policy and governance arrangements will improve regulatory quality and support its focus on regulatory reforms to directly enhance innovation, competition, productivity and economic growth. Efforts to reduce compliance burden will continue to be a focus of the Government's regulatory policy.

From late 2013, the Australian Government put in place a reformed approach to managing regulation to reduce the cost of complying with Australian Government rules and regulation. It also put in place arrangements to foster significant change in regulatory practice across the Australian Public Service.

From 1 July 2016 the Government is strengthening the focus of its Regulatory Reform Agenda to pursue regulatory reforms that remove barriers to competition, innovation and growth; building on the ongoing commitment to cut red tape, improve regulator performance, and strengthen Regulatory Impact Analysis processes.

Through the strengthened Agenda, the Government will continue to minimise the cost of complying with Australian Government regulations while also working to remove unnecessary regulatory barriers to productivity, innovation and growth."

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2. Provide Multiple Pathways to Obtain Licences.

It is crucial that government, DIRD & CASA (Board) admit the regulatory and red tape development program of the last decade is a failure and a mistake that is preventing regulatory reform that meets government policies as stated above. Only when this is accepted will proper regulatory reform be achieved.

Regulatory reform should be creating employment, growth and innovation & lowering costs and enhancing safety.

Over the last decade or so, the multiple pathways for people to enter aviation have been restricted to a singular pathway that has restricted employment, growth, economic reform, innovation, etc. All that the government has promised Australians with regulatory reform has been excluded in regulatory development.

Past & proposed regulatory changes are restricting adopting multiple pathways.

[Read more](#)

3. Implement ICAO AME Compliant & Non-Compliant Licence?

With the formal VET training system looking like it will address the three issues we have raised (adding piston competencies, repackage into modules and change Aeroskills to AME) then the next thing is issue and reissued AME licences stating they comply with Annex 1.

This also means adopting ICAO licence privileges and listing the scope of each licence and/or rating in broader terms in Standards.

Return to an ICAO licence with privileges to certify as airworthy and sign a maintenance release is AMROBA position.

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1. Government's Purpose of Regulatory Reform.

When will aviation have proper regulatory reform meeting the PM's policy?

Department of Prime Minister: *"The challenge for any government is to deliver effective and efficient regulation and regulatory frameworks **that impose the least necessary burden on businesses, community organisations and individuals in delivering economic and social outcomes.**"*

*Recent changes to the Australian Government regulatory policy and governance arrangements will improve regulatory quality and support its focus on regulatory reforms to **directly enhance innovation, competition, productivity and economic growth.** Efforts to **reduce compliance burden** will continue to be a focus of the Government's regulatory policy.*

*From late 2013, the Australian Government put in place a reformed approach to managing regulation to **reduce the cost of complying with Australian Government rules and regulation.** It also put in place arrangements to **foster significant change in regulatory practice across the Australian Public Service.***

*From 1 July 2016 the Government is strengthening the focus of its Regulatory Reform Agenda to pursue regulatory reforms that **remove barriers to competition, innovation and growth;** building on the **ongoing commitment to cut red tape, improve regulator performance, and strengthen Regulatory Impact Analysis processes.***

*Through the strengthened Agenda, the Government will continue to **minimise the cost of complying with Australian Government regulations** while also working to **remove unnecessary regulatory barriers to productivity, innovation and growth.**"*

Government Regulatory Reform Major Topics

1. **Impose the least necessary burden** in delivering economic outcomes.
2. **Directly enhance** innovation, competition, productivity, and economic growth.
3. **Reduce the cost** of compliance.
4. **Foster significant change** in regulatory practice.
5. **Remove barriers** to competition, innovation and growth.
6. **Ongoing commitment** to cut red tape.

CASA Regulatory Development (Not Reform)

1. **Has increased** the regulatory burden without delivering economic outcomes.
2. **Restricted** innovation, competition, productivity and economic growth.
3. **Increased the cost** of compliance.
4. **Increased cost** with significant change in practices.
5. **Created barriers** to growth.
6. **Committed to increasing** red tape and regulatory requirements.

Without doubt, all industry has seen produced under this policy is the opposite to the PM Regulatory Reform policy clearly stated on the website of the PM.

Obviously, those within CASA do not see themselves as part of government unlike the FAA reforms being carried out under President Trump's direction.

Even 'Blind Freddy' can see that adopting the USA aviation system would meet the PM's policy for all six major topics listed above.

Surely CASA would have provided a plan to meet these government initiatives that would remove the unique and unnecessary regulations and red tape that is restricting this industry, especially General Aviation, from achieving its full potential.

ADOPTING THE GOVERNMENT'S REGULATORY REFORM POLICIES WILL SEE GROWTH, INNOVATION, PRODUCTIVITY, etc.

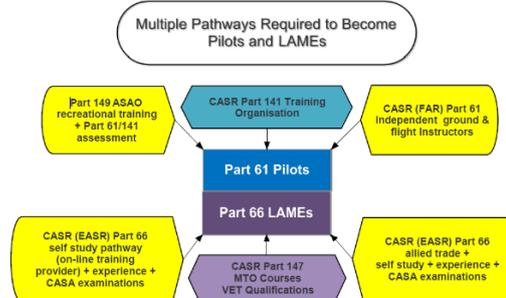
CAN BE DONE QUICKLY – ADOPT THE FARs IS URGENT TO CREATE JOBS.

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2. Providing Multiple Pathways to Obtain a Licence.

It is crucial that government, DIRD & CASA (Board) admit the regulatory and red tape development program of the last decade is a failure and a mistake that is preventing regulatory reform to meet government policies as stated above. Only when this is accepted will proper regulatory reform be achieved.

Over the last decade or so, the multiple pathways for people to enter aviation have been restricted to singular pathways that has restricted employment, growth, economic reform, innovation, etc. All that the government has promised Australians with regulatory reform has not happened in GA.



Aviation is built on individuals being licenced by CASA who have clear individual regulatory roles based on international responsibilities within the scope of the licence and/or rating.

CA[S]R entry control does not provide the same pathways under, for example, the USA FAR system. The current system is locked to formal courses provided under CASR Part 141 & 147. A return to a more flexible approach to enter aviation must happen.

The CASA regulatory and red tape development program of the last decade or so has consciously removed multiple pathways to obtain a pilot or AME licence.

The FAA provides multiple pathways for the pilot: Either Part 61 or Part 141 training pathways. Part 61 does the most pilot training in the USA so why not have it here?

Pilot training under FAR Part 61 independent ground and flight instructors' amount to 70% of pilot training in the USA. The use of the FAR Part 61 independent instructors would help resurrect aero clubs and flight training throughout Australia.

Another important issue is to transition from a "pilot certificate" issued by a Part 149 ASAO to a Part 61 licence. The "pilot certificate" holder must be able to transition to a CASA issued licence. Use a Part 61 instructor or Part 141 training organisation?

An independent system existed prior to the CAA and the making of CARs in 1988.

EASA provides multiple pathways for the LAME: EASA Part 66 provides multiple pathways that enables a person to meet regulatory requirements of experience plus pass NAA examinations to obtain an AME licence.

EASA, like the FAA, recognise that multiple pathways are required to licence AMEs.

Under EASA Part 66, a person may:

1. Attend an approved course (VET diploma) plus reduced experience to obtain an AME licence;
2. Self-study 1: Work in an AMO to obtain experience plus pass CASA examinations to obtain an AME licence;
3. Self-study 2. Work in an AMO to obtain experience, use an on-line training provider, pass CASA examinations to obtain an AME licence; and
4. Self-study 3. Allied trade employee work in AMO, reduced experience requirements, pass CASA examinations to obtain an AME licence.

The industry is desperate for new pilots; and increased general aviation aircraft utilisation, that adopting the FAR Parts 61 and 91 would provide.

ADOPT – ADOPT – ADOPT

STOP 'AUSTRALIANISING' ADOPTED REGULATIONS & STANDARDS.

Industry has lost confidence in the ability of CASA to control Regulatory Reform.

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3. Implement an ICAO AME Compliant & Non-Compliant Licence.

With the formal VET training system looking like it will address the three issues we have raised (adding piston competencies, repackaging into modules and change Aeroskills to AME) then the next thing is issue and reissued AME licence stating they comply with Annex 1.

This also means adopting ICAO licence privileges and listing the scope of each licence and/or rating in broader terms in Standards. Considering CASA decided to adopt the EASA Part 66 licence why didn't it also adopt the licence format itself?

This format is popular in the Asia/Pacific region and includes a statement that it meets the intent of ICAO Annex 1. We need a statement that the licence meets the requirement of ICAO Annex 1 to the Convention.

ICAO FAQ Responses state:

“ICAO compliant licence

Some States include a statement on the licence specifying that the licence meets the requirement of ICAO Annex 1 to the Chicago Convention. When it is not the case, licence holders may verify with the Civil Aviation Authorities in their respective States whether their licence is in compliance with ICAO requirements. Each individual Contracting State should have the information available as they have the duty to inform ICAO of any difference between ICAO licensing Standards and their national/regional regulations.

Non-ICAO compliant licence

1. An endorsement with a "Licence does not meet ICAO requirements" statement may appear on a licence in two different situations:
 - the licence covers an activity for which no ICAO licensing requirements exist. Typical examples are microlight or recreational pilot licences; or
 - the licence covers an activity [maintenance] for which ICAO has established licensing requirements but the holder does not meet all conditions related to age, knowledge, experience, instruction, skill and medical fitness.
2. Licences that do not meet ICAO requirements are not recognized internationally and are therefore valid only in the airspace of the State that has issued such a licence."

Australia issued Airworthiness Authorities (Maintenance Authorities) for this purpose so maybe there is still a need to provide a regulatory provision in CASRs so CASA can issue such a licence endorsed "licence does not meet ICAO requirements"

This applies in both pilot (e.g. *RA-Aus Pilot Certificate*) and maintenance fields and provides regulatory flexibility to address current and future unknown needs of the industry. New innovation is being implemented into aircraft at an ever increasing speed and restrictive regulations that do not provide for the unknown is frustrating to industry growth and jobs.

Instead of creating restrictive pathways, CASA needs to ensure multi-pathways and reduce regulation and red tape.

CAA(UK) Regulatory Reform Policy: *Much of our work to make our regulation of recreational GA more proportionate is being undertaken through the GA change programme that ensures we stick to our top level principles for better GA regulation. These are:*

- Only regulate directly when necessary and do so proportionately;
- Deregulate where we can;
- Delegate where appropriate;
- Do not gold-plate, and quickly and efficiently remove gold-plating that already exists;
- Help create a vibrant and dynamic GA sector in the UK.

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I.
EUROPEAN UNION (*)
[STATE]
[AUTHORITY NAME & LOGO]

II.
Part-66
AIRCRAFT MAINTENANCE
LICENCE

III.
Licence No. (MEMBER STATE
CODE)[66,XXXX]

EASA FORM 28 Issue 3

IVa. Full name of holder:

IVb. Date and place of birth:

V. Address of holder:

VI. Nationality of holder:

VII. Signature of holder:

III. Licence No:

VIII. CONDITIONS:

This licence shall be signed by the holder and be accompanied by an identity document containing a photograph of the licence holder.

Endorsement of any categories on the page(s) entitled Part-66 CATEGORIES only does not permit the holder to issue a certificate of release to service for an aircraft.

This licence when endorsed with an aircraft rating meets the intent of ICAO annex 1.

The privileges of the holder of this licence are prescribed by Regulation (EC) No 2042/2003 and in particular its Annex II (Part-66).

This licence remains valid until the date specified on the limitation page unless previously suspended or revoked.

The privileges of this licence may not be exercised unless in the preceding two year period the holder has had either 6 months of maintenance experience in accordance with the privileges granted by the licence, or met the provision for the issue of the appropriate privileges.

III. Licence No:

IX. Part-66 CATEGORIES

VALIDITY:	A	B1	B2	B3	C
Aeroplanes Turbine			n/a	n/a	n/a
Aeroplanes Piston			n/a	n/a	n/a
Helicopters Turbine			n/a	n/a	n/a
Helicopters Piston			n/a	n/a	n/a
Avionics	n/a	n/a	n/a	n/a	n/a
Large Aircraft	n/a	n/a	n/a	n/a	n/a
Aircraft other than large	n/a	n/a	n/a	n/a	n/a
Piston-engine non pressurised aeroplanes of 2 000 Kg MTOM and below	n/a	n/a	n/a	n/a	n/a

X. Signature of issuing officer & date:

XI. Seal or stamp of issuing Authority:

III. Licence No: