

1. Dick Smith on the right track.

For him or against him, Dick is committed to seeing aviation, especially general aviation, prosper in this country. We have stated for years that the current Civil Aviation Act and even the Airport privatisation legislation, need to be completely reviewed. Dick has been successful in getting both political parties to agree that the Act needs modernisation to support the safe development of aviation, both private and commercial. General aviation is supported by many small businesses that today suffer from excessive red tape generated under a flawed aviation Act of Parliament. What is the main causal problem behind the development of regulations not supported by industry?

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AGAA, the Australian General Aviation Alliance has been formed between AOPA, AMROBA & SAAA. AGAA is dedicated to working together with other GA representatives for the betterment of general aviation.

2. Will the Part 66 outcome meet the future LAME needs?

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2. The other role of the LAME is to certify the aircraft, or part of an aircraft or system, that has undergone maintenance as “airworthy”; i.e. continues to meet its airworthiness standards.

This simply means the LAME must understand the basic airworthiness standards related to the particular aircraft. Recent changes to those standards must be taken into account.

But what types of aircraft are going to be manufactured under the new global Part 23 aeroplane airworthiness standards. There are actually 8 levels of design standards within the new Part 23.

Low Speed (≤ 250 Knots KCAS) (Will the B1.2 LAME cover these aeroplanes?)

- Level 1, Low Speed – 0-1 seats;
- Level 2, Low Speed – 2-6 seats;
- Level 3, Low Speed – 7-9 seats; &
- Level 4, Low Speed – 10-19 seats.

High Speed (> 250 KCAS) (Will the B1.1 LAME cover these aeroplanes?)

- Level 1, High Speed – 0-1 seats;
- Level 2, High Speed – 2-6 seats;
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Because of changes globally to Part 23, the LAME of the future will need training to understand these new airworthiness standards that they will be certifying compliance with, in the future.

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3. Time for small businesses to unite

The general aviation industry is an economic generator. It equates to jobs and income. There is an important link between an aerodrome and a community’s economic vitality. Many small businesses rely on this industry for access to markets like the major air, rail and maritime transportation systems.

It includes small not for profit businesses like “Little Wings” www.littlewings.org.au/ whose mission is to provide a professional, free and safe flight and ground transport service for children from rural and regional NSW to access specialised medical services and treatment in major centres.

There are hundreds of small businesses like Little Wings trying to make a living as well as many private operators that are being squeezed out of the aviation by excessive red tape and costs. Add private aviation, maintenance, manufacturers and flight and engineering training, then we have general aviation.

Government must make the decision whether they actually support general aviation or not.

Airports are important to a community because they provide local businesses with access to the global market. They help retain and attract business to a community and thus provide jobs and economic prosperity for the area.

Maintenance and manufacturing also add to the jobs possibility within this area.

The only way that general aviation can influence the politicians is to have a meeting in the politicians own back yard – for instance the Parliament House Theatre which is an excellent venue for presentations, conferences and film screenings, and it offers fully tiered seating for 288. We can fill that theatre.

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1. Governments have no general aviation policy.

For him or against him, Dick is committed to seeing aviation, especially general aviation, prosper in this country. We have stated for years that the current Civil Aviation Act and even the Airport privatisation legislation, need to be completely reviewed. Dick has been successful in getting both political parties to agree that the Act needs modernisation to support the safe development of aviation, both private and commercial. General aviation is supported by many small businesses that today suffer from excessive red tape generated under a flawed aviation Act of Parliament.

What is the main causal problem behind the development of regulations not supported by industry?

Ans. Application of large commercial practices to small/medium businesses and private operations.

Maintenance and manufacturing both require the utilisation of aircraft as a form of transport and also to use the aircraft for commercial reasons besides airline operations. Individuals that hold licences and ratings issued by CASA must be able to use those licences and ratings as they were intended to be used.

What is not needed is the myriad of red tape added to those exercising the privileges of those licences and ratings. For example, who must use a Part 145 organisation to perform their maintenance?

ICAO: “Commercial air transport operator. An operator that, for remuneration, provides scheduled or non-scheduled air transport services to the public for the carriage of passengers, freight or mail. This category also includes small-scale operators, such as air taxis and commercial business operators, which provide commercial air transport services.”

Note: Carriage of passengers, freight or mail irrespective of size of operator

However, ICAO also recognises there is a standard for a maintenance organisation servicing a commercial aeroplane air transport (airline) operator whilst providing relief for an “*equivalent system*” to be used.

Example: The USA system utilises a non FAA approved Fixed Based Operator (FBO) System.

CAR 30 addressed the difference by uniquely defining aircraft as Class A & Class B to implement what was in the CAO 104 series where GA AMOs only complied with specified requirements in the CAOs. This was how the Department adapted the USA FBO system by issuing a certificate of approval to comply with CAOs.

Best case scenario: Return to the ‘controlled’ USA FBO system that operated under the pre-1988 Air Navigation Regulations and Air Navigation Orders AND adopt the ICAO Maintenance Release system.

ICAO Annex Standards

ICAO Annex 6, Part 1, Commercial Air Transport: (Aeroplanes)

8.1.2 An operator shall not operate an aeroplane unless it is maintained and released to service by an organization approved in accordance with 8.7 [Approved Maintenance Organisation], or under an equivalent system, either of which shall be acceptable to the State of Registry.

ICAO Annex 6, Part 2, International General Aviation -Aeroplanes

Section 2. General Aviation Operations

2.6.1.2 The owner or the lessee shall not operate the aeroplane unless it is maintained and released to service under a system acceptable to the State of Registry.

2.6.1.3 When the maintenance release is not issued by an approved maintenance organization in accordance with Annex 6, Part I, 8.7, the person signing the maintenance release shall be licensed in accordance with Annex 1. [LAME]

Section 3. Large and Turbojet Aeroplanes

3.8.1.1. An operator shall comply with the requirements of 2.6.1. [See 2.6.1.2 & 2.6.1.3 above.]

3.8.2. Operator’s maintenance control manual

ICAO Annex 6, Part 3, International Operations — Helicopters

Section II, International Commercial Air Transport (Helicopters)

6.1.2 An operator shall not operate a helicopter unless it is maintained and released to service by an organization approved in accordance with Annex 6, Part I, 8.7, or under an equivalent system, either of which shall be acceptable to the State of Registry.

6.1.3 When the State of Registry accepts an equivalent system, the person signing the maintenance release shall be licensed in accordance with Annex 1. [LAME]

Section III International General Aviation (Helicopters)

6.1.2 The helicopter shall not be operated unless it is maintained and released to service under a system acceptable to the State of Registry.

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Pre reform in 1990, AMO's servicing aircraft other than Commercial Air Transport had to comply with the Standards & Procedures promulgated in CAOs. Basically, a slightly more formal USA maintenance FBO system.

The need for CASR Part 145 AMOs in the future will provide services to all of the above classifications.

However, the full requirements of Part 145 AMO can be adapted so an equivalent system, like existed before reform, can be adopted and acceptable to the State of Registry (CASA).

Australia's unique maintenance release

Originally, the ICAO maintenance release was applied that allowed a LAME to sign and issue a maintenance release. Another major issue that needs to change is the "period of validity" that is placed on the CASA Maintenance Release Document and the requirement that an item must remain serviceable post a maintenance release being issued. A "maintenance release" is, in every other country, a release from maintenance (return to service).

ICAO: A maintenance release is a certification which includes:

- "a) details of the maintenance carried out including detailed reference of the approved data used. Where appropriate, a statement that all items required to be inspected was inspected by a qualified person who determined that the work was satisfactorily completed;*
- b) the date such maintenance was completed and the total flight hours and cycles;*
- c) when applicable, the identity of the AMO; and*
- d) the identity and authorization of the person signing the release."*

Change the title of CASA's Maintenance Release and call it CASA's Flight & Technical Log with no period of validity, will align Australia with the rest of the world.

Basically, returning to compliance with the minimum ICAO standards and adopting the FAA approach to general aviation will return higher utilisation of general aviation aircraft that results in general aviation engineering (design, maintenance, manufacturing & training) jobs.

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Because of changes globally to Part 23, the LAME of the future will need training to understand these new airworthiness standards that they will be certifying compliance with, in the future.

It looks like the original Group Ratings would be better to retain.

Aerospace Industry Reference Committee

Because CASR Part 66 AME licencing was so badly introduced, the education system is at last being changed to properly underpin the career pathways for apprentices and tradespersons.

Though the Aerospace IRC AME training package changes are making progress, it is painfully slow. All of this should have been done before CASA partially adopted the EASA Part 66 system. The whole education system computer codes and packaging have to be reviewed and changed. The damage done by the lack of communication with the Education Department when CASR Part 66/147 is unforgiveable and causes massive administrative issues for the Education Department.

We are still in a Catch 22 situation until CASA amends Part 147 MoS to adopt EASR Part 147 Appendix relating to course duration and split between theoretical and practical training. For the same reason why EASA specifies the course duration and split, CASA must amend Part 147 MoS. EASA course duration and split is to ensure each EU State provides the funding to provide the training to the same standard.

In hindsight, what is now being done by the Aerospace Industry Reference Committee is what should have been done before commencing CASR Part 66.

AMROBA urged from day one that a “whole of government” process had to apply when the most crucial element was not controlled by CASA. CASA adopted parts of the EASA requirement BUT should have negotiated with the Education Department to also adopt the EASA training standards and to totally repackage the training in the national training system.

Because this was not done, industry has been left with a badly implemented system more than a decade later.

It has not been CASA that has helped in the corrections needed. It has been the government education reform and the creation of Australian Industry and Skills Committee and the Aerospace Industry Reference Committee (Aerospace IRC) formed to replace the past structure. There is also an *Aviation* IRC for pilots, etc. and this *Aerospace* IRC for maintenance related training.

Timeframe: What has been identified by the new Aerospace IRC is the re-packaging of the Diploma courses into the modules will not happen quickly. Even if final approval is obtained to fund the Aerospace IRC to do this work, it will probably not be introduced into training facilities until 2020.

Apprentices completing training in 2022/3 will benefit from these changes.

AMROBA is also lobbying to change “MEA Aerospace” qualifications to “Aircraft Maintenance & Engineering” qualifications to harmonise with the rest of the Asian Pacific Region.

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Canberra Meeting – Date to be Confirmed

The only way that general aviation can influence the politicians is to have a meeting in their own back yard – for instance the Parliament House Theatre which is an excellent venue for presentations, conferences and film screenings, as it offers fully tiered seating for 288. The adjoining Theatre Foyer provides the ideal area for conference registration, refreshment breaks, buffet lunches and cocktail parties for up to 150 guests.

It is time for private operators, small operators, aero clubs, general aviation maintenance design, maintenance and manufacturing participants to tell the politician just what it is like to exist in this regulated system.

AMROBA alliance with AOPA, SAAA and others agree we need large meeting hopefully addressed by Dick Smith on his push for Act changes. These associations have one aim, remove the unnecessary regulations and red tape that is inhibiting aviation.

It is not just aviation requirements that is inhibiting general aviation, there is also the aerodrome legislation and the belief that the aviation industry should fully support aerodromes. Aerodromes are there for the benefit of the community they serve. We are willing to work with government to achieve safe growth of GA.

Adopt the FAR System for General Aviation

It is time to adopt the USA system for general aviation. Even the GA FARs, without change, are better than what we have. Look at some of the following excerpts. The clarity of the language and words is what we need. Look at the following:

1. Aircraft to be airworthy and pilot responsible to determine aircraft in safe condition:

FAR 91.7 Civil aircraft airworthiness.

- (a) No person may operate a civil aircraft unless it is in an airworthy condition.
- (b) The pilot in command of a civil aircraft is responsible for determining whether that aircraft is in condition for safe flight. The pilot in command shall discontinue the flight when unairworthy mechanical, electrical, or structural conditions occur.

2. Aircraft must be inspected.

§ 91.405 Maintenance required.

Each owner or operator of an aircraft—

- (a) Shall have that aircraft inspected as prescribed in subpart E of this part and shall between required inspections, except as provided in paragraph (c) of this section, have discrepancies repaired as prescribed in part 43 of this chapter;

3. Minimum inspection standards in regulations

§ 91.409 Inspections.

- (a) Except as provided in paragraph (c) of this section, no person may operate an aircraft unless, within the preceding 12 calendar months, it has had—

- (1) an annual inspection in accordance with part 43 of this chapter and has been approved for return to service by a person authorized by § 43.7 of this chapter; or

- (2) An inspection for the issuance of an airworthiness certificate in accordance with part 21 of this chapter.

No inspection performed under paragraph (b) of this section may be substituted for any inspection required by this paragraph unless it is performed by a person authorized to perform annual inspections and is entered as an “annual” inspection in the required maintenance records.

4. Part 43 – Maintenance, Preventive Maintenance, Rebuilding and Alterations

§ 43.1 - Applicability

- (a) Except as provided in paragraphs (b) and (d) of this section, this part prescribes rules governing the maintenance, preventive maintenance, rebuilding, and alteration of—
 - (1) Aircraft having a U.S. airworthiness certificate;
 - (2) Foreign-registered civil aircraft used in common carriage or carriage of mail under the provisions of Part 121 or 135 of this chapter; and
 - (3) Airframe, aircraft engines, propellers, appliances, and component parts of such aircraft.
- (b) This part does not apply to any aircraft for which the FAA has issued an experimental certificate, unless the FAA has previously issued a different kind of airworthiness certificate for that aircraft.
- (c) This part applies to all life-limited parts that are removed from a type certificated product, segregated, or controlled as provided in §43.10.
- (d) This part applies to any aircraft issued a special airworthiness certificate in the light-sport category except:
 - (1) The repair or alteration form specified in §§43.5(b) and 43.9(d) is not required to be completed for products not produced under an FAA approval;
 - (2) Major repairs and major alterations for products not produced under an FAA approval are not required to be recorded in accordance with appendix B of this part; and
 - (3) The listing of major alterations and major repairs specified in paragraphs (a) and (b) of appendix A of this part is not applicable to products not produced under an FAA approval.

§ FAR 43.5 - Approval for Return to Service

No person may approve for return to service any aircraft, airframe, aircraft engine, propeller, or appliance, that has undergone maintenance, preventive maintenance, rebuilding, or alteration unless—

- (a) The maintenance record entry required by §43.9 or §43.11, as appropriate, has been made;
- (b) The repair or alteration form authorized by or furnished by the Administrator has been executed in a manner prescribed by the Administrator; and
- (c) If a repair or an alteration results in any change in the aircraft operating limitations or flight data contained in the approved aircraft flight manual, those operating limitations or flight data are appropriately revised and set forth as prescribed in §91.9 of this chapter.

FAR Part 43 has 11 regulations that cover maintenance. It has stood the test of time. There are many US court rulings based on these FARs and they have not been changed for many years. They work. They are safe.

We need to educate politicians that we are just like any other industry, it needs sensible laws to enable it to develop safety; adoption of the FARs will enable this to happen.

CASA needs airworthiness staff trained by the FAA in Oklahoma City (FAA Training Facility) so they can understand how the requirements are applied.

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