



## Meeting with CASA Board, CEO and Executives, Bankstown Airport, 16/05/2022

**AMROBA believes these actions will grow aviation safety.**

No consultation required, just action to fix and consult on implementation.

### Five Major CASA Actions Required with Implementation Consultation ONLY.

1. Independent Flying Schools.
2. Directly supervised AMOs.
3. Realignment Part 21 – FAR Part 21.
4. Realignment with CASR Part 66.
5. DEEWR NVET qualifications that align with CASR Part 66 licences.

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#### 1) Independent Flying Schools

**Resurrect** ANR 68 exemptions for directly supervised flying schools that must employ an independent flight instructor and/or ground instructor to manage.

- a) Originally based on FAA non-approved FBO system specified in FAA (Airport Division) AC 150-/5190-7, *Minimum Standards for Commercial Aeronautical Activities Specialised Aviation Service Operations*. (SASOs – some FBO are approved by FAA, some not.)
- b) To make the FAA system work in Australia, either airports would have to have same powers as in the US or (as was available pre CAA/CASA) a simplified registration process with CASA to enable CASA to provide regulatory oversight. (refer FAA AC Section 2. para's (c) & (d)). This would enable the FAA Part 61 training schools to once again operate in Australia. (Also see item 2 below).
- i) Extract: “aircraft flying clubs, flight training, aircraft airframe and powerplant repair/maintenance, aircraft charter, air taxi or air ambulance, aircraft sales, avionics, instrument or propeller services, or other specialized commercial flight support businesses.”
- ii) FAA AC Minimum Airport Standards should also be applied by CASA to all airport operators to standardise the approach taken by airport operators.

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#### 2) Direct Supervision Aircraft Maintenance Organisations

**Resurrect** ANO 104.1 directly supervised aircraft/component maintenance organisations (pre CAA) and compliance with Appendix 2 of that Order. (Note: Not airline maintenance unless operating under an airline's maintenance quality control system).

- a) Originally based on FAA non-approved FBO system specified in FAA (Airport Division) AC 150-/5190-7, *Minimum Standards for Commercial Aeronautical Activities Specialised Aviation Service Operations*. (SASOs – some approved by FAA, some not.)
- b) Can be resurrected by stating in Part 145 a directly supervised AMO must comply with either the same standards from the ANO or, adopt the standards approach from FAA (Airport Division) AC 150-/5190-7, *Minimum Standards for Commercial Aeronautical Activities Specialised Aviation Service Operations*, and insert them in an Appendix attached to CASR Part 145. This would enable the FAA non-approved FAA/FBO/SASO to once again operate in Australia.
  - i) FAA AC Appendix 1 states. i. “**Fixed-Base Operator (FBO)**. A commercial business granted the right by the airport sponsor to operate on an airport and provide aeronautical services such as fuelling, hangaring, tie-down and parking, aircraft rental, aircraft maintenance, flight instruction, etc.”
  - ii) Sample of California's municipal Airport Minimum Standards provided.

### 3) Realignment of CASR Part 21 with FAR Part 21

CASA advised the engineering sector in 2017, they would realign with FAR Part 21 urgently post the CASA-FAA Bilateral Agreement meeting in Canberra. We are all still waiting while industry reduces in size under a a CASA added practices that are different from FAA practices and procedures.

- a) FAR Part 21 was heavily amended in 2009 to implement “ quality systems” that Australia had for many years until they adopted FAR Part 21. It also made designers and manufacturers more responsible for their products (includes aircraft).
- b) Manufacturing and design organisations and individuals fully supported this announcement to realigned due to major changes to FAR Part 21 that made industry manufacturers and designers responsible for their products and closer alignment with EASA CS 21.
  - i) Without this happening ASAP, Australian manufacturers will follow companies like ‘Thomas Global Systems’ that moved to the US.
    - (1) TGS advised the government and department that the CASA issued design, maintenance and manufacturing approvals are not recognised globally, neither are the CASA documents for release of manufactured or maintained products globally acceptable.
    - ii) Without change, CASA cannot negotiate improvements to the BASA with the FAA or similar arrangements with other nations TO RECOGNISE CASA approved design/manufacturing organisations/individuals **in their own right and the acceptance of CASA certificates.**

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### 4) Realignment of CASR Part 66 with EASR Part 66

CASR Part 66 as introduced into the CASRs has not been fit for purpose for the GA and especially the helicopter sectors. It is also non-compatible with Australia’s National Vocational Education Training System without changes.

- a) Like CASR Part 21, when another NAA’s regulations are adopted, CASA bears the responsibility of maintaining the adopted CASR Part harmonised with amendments made by the Part’s original NAA.
- b) EASA found their original regulations DID NOT WORK for GA so they have continually been making changes so that the Part would work for all including general aviation and sport and recreational sectors similar to FAA changes in their system.
- c) EASR made numerous changes to Part 66 “to make it work better in general aviation” by introducing additional licences and certificates to support general aviation. In addition, they added “Group” ratings to current licences to assist GA just like CASA’s predecessors added “group ratings” in the past to support GA.
  - i) It is also important to understand that EASR Part 66 is a “knowledge-based” training system and not a competency-based system used in Australia’s Australian Qualification Framework. CASA must accept conversion to competency based to make it fit for purpose in Australia.
  - ii) This matter is discussed further in the item 5.

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### 5) Acceptance of NVET AQF qualifications to issue Part 66 licences.

Employers and LAMEs had CASA support to accept AQF qualifications in lieu of CASA Basic Examinations back in the 1990s and early 2000s.

- a) CASA is not an ‘educator’ so AMROBA has proposed to DTRDC that the Convention’s Annex 8 Personnel Training be officially made the responsibility of DEEWR to provide maintenance personnel training to global standards.
- b) CEO Spence has been kept informed of the positive acceptance by DTRDC to work with DEEWR to achieve this ‘historic’ change. DEEWR is also keen to take on this responsibility.
- c) This was not possible until 2005 when the Australian National Training Authority was abolished and DEEWR took responsibility for .
- d) Global training standards require training pathways to underpin licences issued by CASA.
  - i) Copies of AMROBA papers attached.
  - ii) If this is achieved in the near future, it will be the first time that the government’s education department has been responsible for aviation maintenance training standards and qualifications.