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NEWSLETTER

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Future 'Made in Australia'

Table of Content

Government Support 1
Harmonisation 1
Civil Aviation Manufacture in Australia 2
Career Pathways Aircraft Maintenance Personnel 2
Global Restrictions & Liberties 3
Civil Aviation Harmonisation 3
Expanding Australian Civil Aviation Manufacturing 4
Government Actions 4

Government Support

"Aviation is a complex and diverse ecosystem, built on the back of the General Aviation sector. General Aviation businesses provide the skills, innovation and expertise that underpins Australian aviation, and are the training ground for our next generation of aviation professionals. The government is committed to growing General Aviation into the future.

Shortages of aviation workers are holding back parts of the aviation industry and putting pressure on remaining teams. We will work with the industry to simplify training pathways without compromising safety, and to plan for future skills and workforce needs. The Aviation White Paper includes long-term policy settings to provide certainty for industry to invest, engage in and broaden skills development and provide secure jobs for the future.

The Australian Government recognises the need to provide certainty for the aviation industry. 15 years after the release of the previous Aviation White Paper, this publication sets out the government's long-term policy vision to deliver a safe, competitive, sustainable, productive and efficient Australian aviation sector out to 2050."

Minister Catherine King – White Paper 2024

Similar motherhood statements have been in the last White Paper and several LNP aviation policy papers whilst the GA industry sustainability struggles with over regulation and red tape.

We have looked at these statements and wonder what happens between the Minister's future view and industry's rejected submissions to achieve the Minister's view of the future.

Our submissions have always been ICAO compliant and harmonised with global standards as well as cost effective but are rejected.

Growing General Aviation can be achieved safely by adopting the FAR system with minimal changes to align with other Australian legislation to remove duplication of government services. For instance, Workplace Health and Safety Law, Consumer Law, Employment Law, Taxation Law, Privacy Law, Education Law, etc. that small businesses must also comply with.

Harmonisation

General Aviation participants have wanted full adoption of the FAR system for over 30 years with minimal change to align with other Australian legislation affecting aviation manufacture and maintenance. Once harmonised, there must be an ongoing system to remain harmonised with the foreign regulatory system adopted. E.g. FAR system for General Aviation.

CASA, not general aviation, adapted **some** of the EASR system relating to aircraft maintenance personnel licences in 2007. **EASRs CASA did not adopt at that time has meant the NVET system has not been able to provide maintenance personnel training courses for the helicopter and general aviation sectors. Without these training courses standards** being adopted, no applicable NVET courses since 2007. No ongoing system to remain harmonised.

Comprehensive training is required to reduce maintenance issues in aircraft incidents/accident reports. Training we don't have in general aviation and helicopter sectors.

Return to Index

Civil Aviation Manufacture in Australia

"*On 11 April 2024 the Prime Minister announced that the government would introduce a* ***Future Made in Australia Act****, signalling the explicit adoption of a new industrial policy for Australia, that aims to capitalise on Australia's advantages in resources necessary for the clean energy transition. The new policy will see government taking a more active role alongside the private sector. The announcement followed on the heels of a similar re-engagement with a more interventionist approach to industry policy among many of the world's major economies.*"

Once again, *civil aviation manufacturing* is not part of this initiative.

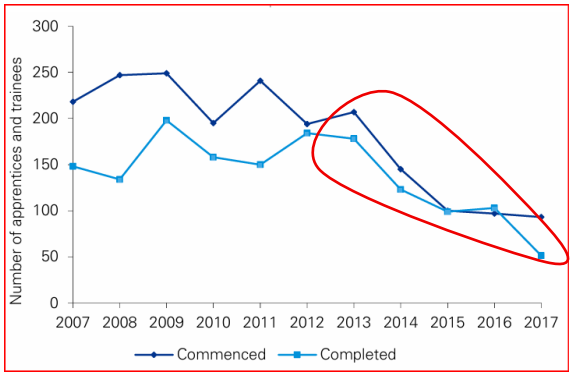
KPMG. *"In the financial year 2016-17, the Aircraft Manufacturing and* ***Repair Services*** *industry directly added over $2 billion to Australia's Gross Domestic Product. In the same year, nationally, the industry employed 13,396 workers* ***across manufacturing and repair activities****, with the* ***key occupation that of aircraft maintenance engineers****, with other engineering professionals and technicians also important occupations in this industry*."

"The availability of skilled labour and the lack of mutual recognition of certifications from key trade partners, ***further weighed down by regulatory requirements****, are considered to be* ***the top challenges faced by industry players going forward***."

"*Australia's Aircraft Manufacturing and Repair Services industry supplies a range of products and services to multiple entities in the economy. The products supplied include airframes, aircraft parts and components, and advanced composite materials.*

Figure 4: Apprentice and trainee enrolments and completions

Figure 4 shows the number of apprentices and trainees in the Aircraft Manufacturing and Repair Services industry commencing or completing training between 2007 and 2017. There has been a declining trend in both the number of enrolments as well as completions by aerospace-related apprentices and trainees in the past decade, thus substantiating the concern expressed by industry stakeholders around increasing difficulties in finding skilled workers."



> *"Shortages of aviation workers are holding back parts of the aviation industry and putting pressure on remaining teams. We will work with the industry to simplify training pathways without compromising safety, and to plan for future skills and workforce needs."*

Career Pathways Aircraft Maintenance Personnel

Unless the NVET system offers training courses for the general aviation and helicopter sectors, there is small chance of providing training courses to support the manufacturing sector.
Many jobs in manufacturing are specialised training by adopting part of a maintenance personnel training course and training those aspects at a higher level of achievement.
Many VET qualified aircraft maintenance personnel work in civil aviation manufacturing.
Once again, the fix is quite simple, full harmonisation with the EASR Parts 66/147 that will enable government to exempt ASQA approved Training Organisations (e.g. TAFE) from duplicate government approval (no CASA Approval) to provide basic trade/licencing training.

Government over-regulation and red tape negates the Minister's vision.

Return to Index

Global Restrictions & Liberties

"AGREEMENT ON THE PROMOTION OF AVIATION SAFETY BETWEEN THE GOVERNMENT OF THE UNITED STATES OF AMERICA AND THE GOVERNMENT OF AUSTRALIA

Article 4 Cooperation and Implementation Procedures

(1) *When the* ***relevant implementing authorities of each Party are prepared to pursue cooperation in a technical area listed below, the implementing authorities shall conduct technical assessments and work cooperatively to develop an understanding of each other's systems including standards, rules, practices and procedures, in the following relevant technical areas:***

a) airworthiness approvals of civil aeronautical products;
b) environmental approval and environmental testing;
c) approval and monitoring of maintenance facilities and alteration or modification facilities;
d) approval and monitoring of maintenance personnel;
e) approval and monitoring of crews;
f) evaluation of flight simulator qualifications;
g) approval and monitoring of aviation training establishments; and
h) any other matters within the scope of this Agreement or otherwise agreed between the Parties through an exchange of correspondence through the diplomatic channel."

This **agreement has been in place since 2005, signed by *John Anderson Dep PM*** and was being pursued until CASA decided to change to the EASR system in 2006/7. AMROBA's external observation is that it has stalled because there is no dedicated staff/office in the Department/Agency to action this process.

Civil Aviation Harmonisation

Importance for Harmonization (ICAO)

"*Harmonization in aviation is vital to ensure safety, efficiency, and environmental sustainability across international airspace. It lays the groundwork for uniform regulations and operational procedures, thereby fostering trust and collaboration among states and industry stakeholders. By aligning standards, ICAO Harmonization Efforts facilitate seamless global air travel.*

Achieving harmonization allows for the sharing of best practices, which enhances safety protocols and operational efficiencies. ***When all nations adopt standardized regulations, it minimizes discrepancies that could lead to accidents or operational inefficiencies, ultimately benefiting passengers and cargo operations alike****.*

The importance of ICAO Harmonization Efforts extends to environmental protection as well. By harmonizing regulations surrounding emissions and noise, ICAO plays a significant role in promoting sustainable aviation practices. Such efforts contribute not only to compliance but also to the global initiative for reducing the aviation industry's ecological footprint."

Harmonisation in the engineering fields of civil aviation manufacturing and maintenance with other nations like the USA will enable CASA to generate *Implementation Procedures* with these nations so Australian manufactured products and maintenance services can be accepted by other nation. Why our products and maintenance services are not mutually accepted by all Asian nations, North America, only government can answer.

It appears that this government responsibility fell down a crack when government created Agencies to be responsible for some Annexes to the Convention instead of all ICAO responsibilities being managed by the Department.

This can be regulatory corrected by government.

Return to Index

Expanding Australian Civil Aviation Manufacturing

Aviation is a global industry, requiring harmonisation, cooperation and collaboration among nations. Global standards provide a platform for international dialogue and consensus-building. Organisations such as International Civil Aviation Organisation (ICAO) and regional regulatory bodies work towards developing and implementing these standards.

Harmonisation with major aviation nations, e.g. USA, EU, Canada, Brazil or GB, by aligning with their regulations, procedures, and infrastructure, will enable mutual recognition of aviation safety agreements enabling trade between Australia and these nations.

Government Actions

Step 1. Government must obtain mutual recognition agreements with other aviation trading nations SO Australian civil aviation manufacturers & maintenance organisations can trade their products and services with other nations.

Step 2. Even the US/Australia BASA (Bilateral Aviation Safety Agreement) needs to be amended to include maintenance services.

Step 3. Government needs to be actively negotiating with other nations to obtain similar agreements to the US/Australia BASA but include maintenance services to open global markets to Australian civil aviation businesses.

Step 4. Harmonisation with either the USA or EU is an ICAO resolution that Australia agreed with so why do our government departments/agencies continually want to create unique systems?

- **Both the FARs (1998) and EASRs (2007) have been amended to be more internationally aligned but the Australian CASRs 21-35 and 66/147 have not kept harmonised with the latest version.**
- **This is why other nations state we are 15 + years behind world standards.**

Step 5. Shortage of maintenance personnel can be overcome simply by harmonising CASR Parts 66/147 with EASR Parts 66/147 and make ASQA responsible to provide basic trade/licencing training courses without the need for CASA to approve VET training organisations under Part 147 as can be done in the EU EASR Part 147B.

- **Without the EASR Part 66 B3 licence, general aviation does not have the flexibility in the licencing enjoyed by EU nations and other nations that have adopted the EU aviation maintenance personnel licencing system.**
- **Without the EASR Part 66 B2L progressive avionics licencing system, there is no progressive training pathways that enables a maintenance person to obtain a basic avionics licence and add additional systems.**
  - **CASA is creating unique systems instead of staying harmonised.**

Step 6. The *Manufacturing Industry Skills Alliance*, responsible for developing basic trade/licencing courses and pathways in the NVET system, must comply with the Australian regulations to develop courses to VET standards so they can be approved and added to the VET system.

- **The VET regulations require each course include "nominated duration in hours" but CASA will not adopt the EASR Part 147 Appendix 1 "nominated hours" specified course hours for the EU Part 66 AME licences that CASA adopted.**
- **One can only assume that CASA is knowingly creating the shortage by preventing NVET courses and pathways to each Part 66 licence been created.**

Step 7. ICAO Assembly Resolutions A-29 and A-33 both supported by Australia provide processes to follow to harmonise design codes with the FAA/EU

- ***Urges* all States of design and other Contracting States to participate in the international harmonization projects as initiated by FAA/JAA;**
- ***Urges States and Groups of States to take positive action to promote global harmonization of national rules for the application of ICAO standards*;**
- ***Urges States to use in their own national regulations the precise language of ICAO regulatory standards in their application of ICAO standards and seek harmonization.***

Return to Index