Date Published 8/11/2025

AMROBA - NEWSLETTER

Volume 22 – Issue 10
November — 2025

Issues Confronting Members

Table of Content

Issues Confronting Members 1
Nothing Changes – Living in the Past 1
Why won't CASA Recognise AQF Qualifications? 2
Maintenance Licences – Education Qualifications 3
The Licence Regulatory Modular Pathways introduced in 2007 3
When Funds Get Tight 4

Nothing Changes – Living in the Past

Having read Pip's submission to the Treasurers meeting, it fully explains why Australia civil aviation in the non-transport sectors are living in the past. Atypical public service submission.

"*No mention of harmonisation so our products are accepted by other authorities, no examples of where red tape have been cut, in fact, from our position, nothing has changed. Politicians will lap this up, but the reality for us on the ground is same old, same old, certainly from members perspective. Examples are what is the point of the interminable desk audits we get from customers? A whole bunch of tick the box questions which are probably filed and forgotten until next year. The need to produce either FAA 8130's or Certificate of Conformance's for non-serialised hardware items is both pointless, as these items are non-traceable, and time consuming. When these two items alone are scrapped, we can concentrate on real work*."

CASA is proposing amendments to CASR Part 21 to address EASR standards, plus.

We advise all members to read these proposals, especially GA participants.

"*We (CASA) are seeking feedback on our proposal to allow foreign non-civil aircraft to be type certified in the restricted category for special purpose operations (such as aerial firefighting). We are also seeking feedback on other miscellaneous amendments*."

They would:

- *retain the option of accepting aircraft from the Australian Defence Force.*
- *remove the current requirement from Part 21 that surplus military aircraft must be accepted by the armed forces of either the United States of America, Canada or the United Kingdom.*
- *replace the requirements for acceptance by foreign armed forces with technical criteria specified in the Part 21 Manual of Standards (MOS). This includes aircraft design, configuration data, critical part identification and records of service and maintenance history.*
- *European standards (certification specifications) for light sport aeroplanes and very light rotorcraft*
- *criteria and standards for approval of equipment used for the carriage of persons external to a rotorcraft. Some content from the related Advisory Circular 21-32 is being added to the MOS to provide automatic approval without the need for a separate application and further approval by CASA*.

If you are unable to provide feedback via the survey link, please email regulatoryconsultation@casa.gov.au for advice."

Many members who have read Pip's submission have realised that we are not part of the global civil aviation engineering system, and future vision is more of the same. There is:

- No commitment to **harmonisation** so Australian aviation engineering can compete globally. When will Australian CASA approved products be accepted by other nations?
- No progress in remaining **compliant** with the Chicago Convention.
- No progress in providing **VET training courses** to underpin CASA AME licences.
- No progress in **reducing** the regulatory burden.
- Our regulatory system is over a **decade behind** mature regulatory systems. FAA/EASA/TCA.
- Aviation is over regulated. Real reform stopped post adopting FAR Parts 21-35.

Why Won't CASA Recognise AQF Qualifications?

Industry, since the mid-1980s, has been lobbying and expecting education AQF qualifications to underpin Aircraft Maintenance Engineer licences. Since 2007, each of the 5 CASR Part 66 licences issued by CASA do not have defined AQF qualifications.

CASA and ASQA should work together to provide these much-needed qualifications.

"*The AQF Qualifications Pathways Policy builds into the Australian Qualifications Framework (AQF)* ***the capacity to genuinely support students' lifelong learning****. It is Australia's national policy on qualifications pathways.*

The principal users of this policy are the ***authorised issuing organisations****, accrediting authorities including self-accrediting organisations,* ***students and graduates in each education and training sectors****.*

The other users of this policy are ***employers,*** *industry and professional bodies, and* ***licensing and regulatory bodies*** *who may use this policy as a guide to the role of credit in developing learning pathways and achieving learning outcomes*"

CASR 66 AME Licencing is based on a modular trade-based system. It contains 5 pathways.

Industry needs CASA to accept ASQA AQF competency-based qualifications as meeting the standards for obtaining a licence. Industry need AQF qualifications to support trade streams.

Industry is basically divided into 4 basic streams, 3 mechanical and one avionics.

General aviation aeroplanes, helicopters, commercial transport aeroplanes and avionics.

Four separate trade streams with 4 specified trade streams underpinning 5 licences.

Integrating AQF AME quals and CASA licencing

ASQA	**Mechanical Pathways**				**Avionics Pathway**	**CASA**
Courses	**Aeroplane (press)**	**Aeroplane (un-press)**	**Helicopter Piston**	**Helicopter Turbine**	**Basic Avionics**	Regulatory Standards
AQF 3	Basic Aeroplane AME		Basic Helicopter AME		Basic AME	**Modules 1-9**
AQF 4	Aeroplane Trade Module **11A**	Aeroplane Trade Module **11B**	Rotorcraft Trade Module **12**		Trade Module **13**	**Modules 11A, 11B, 12 & 13**
	B1.1 A	B1.2 A	B1.3 A/4 A		**B2 modular**	Licences
AQF 5	Post Trade	Post Trade	Post Trade		Post Trade	**Module 10**
	B1.1	B1.2	B1.3	B1.4	B2	Licences

Employers need access to academic pathways for their employees that enables the employee to attain a CASA licence in their field, GA aeroplanes, helicopters, CAT transport aeroplanes and an Avionics stream.

To finalise this system, it needs bridging courses between each of these trade streams.

CASA/ASQA should get together and provide such a system to reduce shortages of AME/LAMEs by providing education pathways for aviation's tradespersons.

Where is the government policy to make it happen?

Annex 1, Chapter 4, specifies the international personnel standards that were met by Australia prior to combining the Department of Civil Aviation with Transport and the creation of Government Agencies.

DCA worked with other government departments and agencies to enable TAFE courses that provided the knowledge and skills required by employers and compliant with ICAO.

Return to Index

Maintenance Licences – Education Qualifications

"The Australian Qualifications Framework (AQF) is the national policy for regulated qualifications across Australian education and training. Established in 1995, the AQF provides a unified system for all qualifications from secondary school through to doctoral degrees.

For trades, the AQF ensures that qualifications are:

- Nationally consistent and recognised.
- Quality-assured through regulation.
- Based on industry-defined competency standards.
- Responsive to industry needs and technological changes.
- Portable between states and territories.

Competency standards are:

- Created and regularly updated with industry input.
- Broken down into specific units of competency.
- Performance-based rather than just knowledge-based.
- Descriptive of both technical skills and workplace practices.
- Inclusive of safety, environmental, and quality considerations.

For trades seeking recognition of their skills, this integrity means that their qualification will **be respected by employers, licensing bodies, and clients**. It's not just a piece of paper—it's nationally validated proof of competency."

Industry, since the early 1990s, has been lobbying and expecting education AQF qualifications to underpin Aircraft Maintenance Engineer licences. Since 2007, each of the 5 CASR Part 66 licences issue by CASA do not have supporting AQF qualifications or dedicated VET courses.

5 separate AQF qualifications supporting the regulatory modular pathways specified in CASR Part 66, MoS, Appendix 1. Refer to AMROBA Training Webpage for B1.1, B1,2, B1,3/4 and B2 trade/licence modular training pathways based on CASR referred standards.

The Licence Regulatory Modular Pathways introduced in 2007

Part 66 regulatory modules and pathways since 2007 not supported by VET qualifications.

		B1.1.	B1.2	B1.3.	B1.4.	B2		AQF	Qual?
1.	Mathematics	**X**	X	X	X	**X**		Nil	Basic Trade Qualifications Pathways B1.1 & B2 available
2.	Physics	**X**	X	X	X	**X**		Nil	
3.	Electrical fundamentals	**X**	X	X	X	**X**		Nil	
4.	Electronic fundamentals	**X**	X	X	X	**X**		Nil	
5.	Digital techniques electronic instrument systems	**X**	X	X	X	**X**		Nil	
6.	Materials and hardware	**X**	X	X	X	**X**		Nil	
7.	Maintenance practices	**X**	X	X	X	**X**		Nil	
8.	Basic aerodynamics	**X**	X	X	X	**X**		Nil	
9.	Human factors	**X**	X	X	X	**X**		Nil	
11A.	Turbine aeroplane aerodynamics structures and systems	**X**						Nil	Specific Trade Qualifications Pathways B.1 & B2 available
11B.	Piston aeroplane aerodynamics, structures and systems		X					Nil	
12.	Helicopter aerodynamics, structures and systems			X	X			Nil	
13.	**Aircraft aerodynamics, (avionics) structures and systems**						**X**		
14	**Propulsion (Avionics)**					**X**		**Nil**	
15.	Gas turbine engine	**X**		X				Nil	
16.	Piston engine		X		X			Nil	
17.	Propeller	X	X					Nil	
10.	Aviation legislation (Licencing)	**X**	X	X	X	**X**		Nil	ALL

Return to Index

When Funds Get Tight

Over the decades we go through times when funds become tight and some aircraft owners financially struggle to cover the running costs, including maintenance costs. In these times, we find owners disputing the costs of the maintenance.

- **General Liens**: These allow a creditor to retain possession of all the debtor's goods in their possession until all debts owed by that debtor to the creditor have been paid. General liens are rare in Australian law and arise mainly in specific professions, like solicitors who may hold a general lien over a client's papers.
- **Particular Liens**: These are more common and allow a creditor to retain possession of a specific item until the debt relating to that item has been satisfied. A classic example is the lien a mechanic might have over a car they have repaired but not been paid for.

In Victoria, a mechanic's lien is a legal right that allows a mechanic to retain possession of a vehicle until the customer has fully paid for the work performed. This lien is possessory, meaning it only allows the mechanic to hold the vehicle as security for payment and does not grant them the right to sell the vehicle to recover the debt unless the customer provides written consent. The mechanic's lien arises automatically once certain conditions have been met, such as continuous possession by the repairer and never broken. It is important for customers to obtain a written notice of the repairs before leaving their vehicle with the mechanic and to ensure they have a clear record of regular servicing and repairs to add to their car's resale value. If payment is not made, the mechanic has the right to keep the vehicle until the debt is satisfied.

It's worth noting that in some states, mechanics are required to provide a written estimate before starting any repairs. This estimate should specify the expected cost of the repairs and any additional charges that may apply. If the final amount exceeds the estimate significantly, you may have grounds for disputing the charge.

Under Australian law, mechanics have the right to hold a vehicle until payment is made for the services rendered, known as a "mechanic's lien." However, they must provide a reasonable and accurate estimate before commencing work and obtain your authorization for any additional repairs. If the mechanic performed work that was not approved by you or overcharged compared to the original estimate, you may have grounds for disputing the charges. It is important to review any written estimates, invoices, and communications you had with the mechanic. If you believe you were overcharged or the work was not performed correctly, you can file a complaint with the Office of Fair Trading or your local consumer protection agency for mediation. Additionally, you may consider seeking legal advice to explore your options for resolving the dispute and potentially recovering your vehicle.

For mechanics and repair facilities, mechanic's liens are a powerful tool to ensure payment. However, it's important to follow the proper legal procedures when filing a lien. Incorrectly filing a lien can lead to legal challenges and potential financial losses. As a result, it is generally a good idea to seek legal guidance as soon as it becomes apparent that filing a lien is necessary.

AMROBA recommends contacting your local legal office.

The concept has been applied to aviation and other associated industries in the past.

Return to Index