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CASA - Easier Processes

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"Expanding Options to Remove Part 66 Aircraft Engineer Licence Exclusions?"

(AMROBA recommends all members, and LAMEs employed support this proposal – years late.)

"*CASA is proposing changes to make **it easier for licensed aircraft maintenance engineers (LAMEs) to remove exclusions from their Part 66 licence.***

These changes would let LAMEs use the self-study pathway for exclusion removal. This will give them more flexibility to expand their licence.

People with modular licences or licences with specific exclusions, will be able to expand the scope of their licence by completing the relevant basic training modules and experience. This allows them to remove the exclusions according to their career pathway or employer's needs.

This will mean people in regional areas, where it can be more challenging to access a maintenance training organisation, will have more options.

It is one initiative to improve pathways for maintenance licences as part of the Aviation White Paper and our General Aviation workplan.

***CASA is seeking feedback on this proposal until 31 October 2025**.*

The consultation also asks for feedback on amendments to update the aircraft type ratings and endorsement tables in Appendix IX of the Part 66 Manual of Standards."

Tell us what you think

AMROBA Comments: Many EU nations used this process when they introduced EASR Parts 66/147. Exclusions were removed from their system quickly, whereas CASA continues to use the exclusion system.

EASA had less exclusions because they also included a B 3 Licence like the CAR 31 GA mechanical LAME holding avionics privileges ratings. An FAA A&P up to 2000Kg.

Is the current Part 66 licencing system compatible with the future GA aircraft types that will be available as of next year.

EASA realised the changing scene by including the B3 A&P style general aviation maintenance engineer up to 2000 kg airplanes.

From AMROBA's viewpoint, the B3 should still be adopted but, with the MOSAIC changes in the USA, maybe the weight limit should be revisited to more harmonise with FAR Part 23 ASTM type aircraft and the new Sports Aircraft Standards.

Look at the advancement in small aircraft designs in Europe over the last two decades that the mosaic rules will now enable the US industry to advance development to broader standards.

Both Sport Aircraft (airplane/helicopter) and Part 23 aircraft can now have full electronic cockpits, retractable landing gear, piston or turbine power, fully composite structures.

Maintenance is far different today than it was for legacy aircraft.

Maintenance Licences – Clearer Advisories?

Have you ever looked at the training of maintenance personnel in other sectors.

The cooperation between employers, education and the applicable regulator in other forms of transport is very different to aviation. The clarity of training courses are years ahead of aviation and attractive to those seeking employment in those sectors.

In most other trades, it states qualification must be held to be able to perform and certify the tasks/work. For example, NSW TAFE automotive courses are well developed.

Can we eventually get such courses into the NVET aviation maintenance training system.

Will CASA now provide clear advisory documents specifying the small aeroplane and helicopter aircraft maintenance engineers training standards?

AMROBA has extracted each trade/licence pathway from the Part 66 Appendix and placed them on our training website.

LAME B1.1, LAME B1.2, LAME B1.3 and 1.4 and LAME B 2

In reality, there are trade training basics (3 mechanical pathways) and 1 avionic pathway.

The only specific licencing training is module 10. Getting the training right in this module is critical to safety decisions that LAMEs make.

If CASA produced each of these as standalone ACs, employers and training providers can develop more applicable training programs for their employees.

Apprenticeship/trade training funding by government is dependent on the "***nominated course hours***" specified in the education template for VET training course approval.

Why does CASA deny this industry this funding by not adopting EASR regulatory imposed course durations? EASR Part 147 Appendix 1.

CASRs is the only mature aviation system where the maintenance regulatory system does not promulgate AME training hours. Why are we so different?

NSW TAFE, Other States similar	
Certificate IV in Aeroskills (Avionics) Course ID: MEA40618 Standard fee: $15,780.00 Estimated fee: $0.00 to $3,820.00	Certificate IV in Aeroskills (Mechanical) Course ID: MEA40718 Standard fee: $15,780.00 Estimated fee: $0.00 to $3,820.00
Hours based on CAR 31 avionic trade system	Underpins the B1.1, not the B1.2 or B1.3/4

NSW TAFE Motor Industry Courses.		
AURETH101 - *Depower and Reinitialise Battery Electric Vehicles (BEVs).* ***AURSS00064*** - *Battery Electric Vehicle Inspection and Servicing Skill Set.*	**AUR20420** - Certificate II in Automotive Electrical Technology **AUR30320** - Certificate III in Automotive Electrical Technology	**AUR30620** - Certificate III in Light Vehicle Mechanical Technology **UR20520** - Certificate II in Automotive Servicing Technology
AUR30820 - Certificate III Motorcycle Mechanical Technology	**AUR31220** - Certificate III in Mobile Plant Technology **AUR21220** - Certificate II in Automotive Underbody Technology	**AUR30420** - Certificate III in Agricultural Mechanical TechnologyAUR30420 - Certificate III in Agricultural Mechanical Technology
AUR21820 - Certificate II in Steering and Suspension Technology	**AUR31120** - Certificate III in Heavy Commercial Vehicle Mechanical Technology	**There are more courses associated with motor industry**

Aviation awaits a NVET system to provide training to support all trade/licencing pathways

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Certification (Product/Maintenance) Harmonised?

Has the issues regarding certification of designs, modifications and repairs, that became apparent with the collapse of Ansett Aviation, of their aircraft that were sold to operators in foreign countries. Australian maintenance certifications for most Australian mods and repairs had to be re-certified under the FAR system so the aircraft could be registered in the US and other countries.

This was the major reason why the Department and CAA management decided, in the early 1990s, the US regulatory system to be adopted and implemented, unless more efficient requirements were in EASRs or TCA Regulations.

International civil aviation engineering is built on agreements between nations like the Bilateral Aviation Safety Agreement with the United States backed by implementation procedures between each country's CAA. E.g. CASA and the FAA, EASA and FAA.

A side effect of attaining these Bilateral Agreements and NAA to NAA Implementation Procedures is the need to keep our OWN civil aviation regulatory system harmonised.

The problem is: Which government department or agency is responsible for attaining these agreements. Civil aviation engineering businesses have no legislative responsible department/agency working to attain these agreements nor legislative requirement for CASA to work with other NAAs to attain agreements to open foreign civil aviation engineering markets for Australian businesses?

Back in the late1990s industry was told that providing government civil aviation documents aligned with the FARs would enable Australian businesses to participate globally.

The Federal government documents

1. The Government's "Australian Authorised Release Certificate."
2. The Government's "Aircraft Type Certificate.
3. The Government's "Australian Supplemental Type Certificate."
4. The Government's "Australian Parts Manufacturing Approval Part."
5. The Government's "Australian Technical Standing Order."

In 1998, these were going to open foreign civil aviation markets for Australian civil aviation manufacturing and maintenance.

The problem is in aviation, there must be an agreement between nations that each regulatory control system is harmonised, and governments accept these aviation documents.

WHICH AUSTRALIAN GOVERNMENT DEPARTMENT HAS THAT RESONSIBILITY?

1. Negotiate government to government civil aviation agreement.
2. Department must also be responsible for regulatory change that will be needed to achieve agreements.
3. The NAAs (CASA/FAA/EASA/DGCA(Indonesia) for example) must provide implementing procedures to encourage trade.
4. Why are we not enthusiastically manufacturing and exporting our AASTCs products, APMA parts, ASTO. No government-to-government agreement.

Whilst other governments progressively negotiate agreements with each other, Australia lags in following the trend.

The incomplete approach taken in civil aviation global alignment and trade is not unique as other sectors also face incomplete procedures and requirements to assist global trade.

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