

# EASR Part 147

## Part 147 Regulation Part B

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AMROBA contends there is no need for CASR Part 147 being involved in basic licence training. In addition, CASRs can refer to NVET qualifications, or similar standards, in legislation as was the original regulatory reform policy to accept VET qualification in lieu of CASA examinations.

Without doubt, in Australia's education system, the **Australian Skills Qualifications Authority** has all the legislative powers to fulfil these provisions under the *National Vocational Education and Training Regulator Act 2011*; *Skills Australia Act 2008*; *Skilling Australia's Workforce Act 2005*; *The Skilling Australia's Workforce (Repeal and Transitional Provision) Act 2005* that transitioned functions and responsibilities to the Department of Education, Employment and Workplace Relations.

Annex 8 places full responsibility on government to provide education and skilling so why would any other government department or government agency take on such responsibility?

NB. Even EASA recognised in some Member States that the education system can provide the training so they included an **exemption** in regulation **147B-25 Exemptions** below.

**If the Department of Education, Employment and Workplace Relations and ASQA were made responsible in 2006, then there would be NO need for CASR Part 147 and there would not be a shortage of civil aviation maintenance personnel.**

The *National Vocational Education and Training Regulator Act 2011* and Regulations more than covers the intent and purpose of these European based regulations.

CASR Part 147 is understandable in the EU as it applies across EU Member States so that there is an EU standards whereas in Australia we have a competency based training system that has proven it can provide skills and qualifications for all other industries and professions.

The Department of **Education, Employment and Workplace Relations** and the **Australian Skills Qualifications Authority** must be made, as quickly as possible, regulatory responsible for the provision on civil aviation maintenance personnel training to global standards.

The following EASR Part 147, Section B & C, not adopted when CASA adopted EASR Part 147, demonstrates why industry has suffered by inadequate training, simply because responsibilities are not with the VET system. **See Part C Appendices**

**For and on Behalf of the AMROBA Board & members**

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*Safety All Around.*

30/4/2022

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### SECTION B — PROCEDURES FOR **ASQA** (COMPETENT AUTHORITIES) SUBPART A — GENERAL

EASR PART 147 SECTION B	COMMENT
<p><b>147.B.05 Scope</b> <i>Regulation (EU) No 1321/2014</i></p> <p>This regulation establishes the administrative requirements to be followed by the competent authorities [ASQA] in charge of the application and the enforcement of regulation A of this Part.</p>	<p>Regulation A is the provision of education for maintenance personnel</p>
<p><b>147.B.10 Competent Authority [ASQA]</b> <i>Regulation (EU) No 1321/2014</i></p> <p>(a) General The Member State <b>shall designate a competent authority [ASQA]</b> with allocated responsibilities for the issuance, continuation, change, suspension or revocation of certificates under this Annex (Part-147). This competent authority [ASQA] shall establish documented procedures and an organisational structure.</p> <p>(b) Resources The competent authority shall be appropriately staffed to carry out the requirements of this Part.</p> <p>(c) Procedures The competent authority [ASQA] shall establish procedures detailing how compliance with this Annex (Part-147) is accomplished. The procedures shall be reviewed and amended to ensure continued compliance.</p> <p>(d) Qualification and training All staff involved in approvals related to this Annex must:</p> <ol style="list-style-type: none"> <li>1. Be appropriately qualified and have all necessary knowledge, experience and training to perform their allocated tasks.</li> <li>2. Have received training and continuation training on Annex III (Part-66) and Annex IV (Part-147) where relevant, including its intended meaning and standard.</li> </ol>	<p>National Vocational Education and Training Regulator Act 2011. <b>Australian Skills Qualifications Authority</b> The government must designate the <b>ASQA</b> as the Authority responsible for training of maintenance personnel <b>ASQA</b> is capable of regulatory enforcement</p>
<p><b>AMC 147.B.10(b) Competent authority</b> <i>ED Decision 2015/029/R</i></p> <p>1. competent authority surveyors should have:</p> <ol style="list-style-type: none"> <li>1.1. practical experience and expertise in the application of aviation safety standards and safe operating practices;</li> <li>1.2. comprehensive knowledge of: <ol style="list-style-type: none"> <li>(a) relevant parts of implementing rules, certification specifications and guidance material;</li> <li>(b) the competent authority's procedures;</li> <li>(c) the rights and obligations of a surveyor;</li> <li>(d) quality systems;</li> <li>(e) continuing airworthiness management.</li> </ol> </li> <li>1.3. training on auditing techniques.</li> </ol> <p>2. five years relevant work experience to be allowed to work as a surveyor independently. This may include experience gained during training to obtain the 1.5 qualification.</p>	<p>ASQA has these capabilities</p>

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<p>3. a relevant engineering degree or an aircraft maintenance or training qualification with additional education. ‘relevant engineering degree’ means an engineering degree from aeronautical, mechanical, electrical, electronic, avionic or other studies relevant to the maintenance and continuing airworthiness of aircraft/aircraft components.</p> <p>3.1. knowledge of a relevant sample of aircraft types</p> <p>3.2. knowledge of maintenance training standards.</p> <p>4. In addition to technical competency, surveyors should have a high degree of integrity, be impartial in carrying out their tasks, be tactful, and have a good understanding of human nature.</p> <p>5. A programme for continuation training should be developed that ensures that the surveyors remain competent to perform their allocated tasks.</p>	
<p style="text-align: center;"><b>AMC 147.B.10(c) Competent authority</b></p> <p><i>ED Decision 2015/029/R</i></p> <p>The documented procedures should contain the following information:</p> <p>(a) The Member State’s designation of the competent authority(ies).</p> <p>(b) The title(s) and name(s) of the manager(s) of the competent authority and their duties and responsibilities.</p> <p>(c) Organisation chart(s) showing associated chains of responsibility of the senior persons.</p> <p>(d) A procedure defining the qualifications for staff together with a list of staff authorised to sign certificates.</p>	<p>ASQA has this for many other trades/professions capability so why not aviation maintenance personnel training</p>
<p style="text-align: center;"><b>147.B.20 Record-keeping</b></p> <p><i>Regulation (EU) No 1321/2014</i></p> <p>(a) The competent authority shall establish a system of record-keeping that allows adequate traceability of the process to issue, renew, continue, vary, suspend or revoke each approval.</p> <p>(b) The records for the oversight of maintenance training organisations shall include as a minimum:</p> <ol style="list-style-type: none"> <li>1. the application for an organisation approval.</li> <li>2. the organisation approval certificate including any changes.</li> <li>3. a copy of the audit program listing the dates when audits are due and when audits were carried out.</li> <li>4. continued oversight records including all audit records.</li> <li>5. copies of all relevant correspondence.</li> <li>6. details of any exemption and enforcement actions.</li> <li>7. any report from other competent authorities relating to the oversight of the organisation.</li> <li>8. organisation exposition and amendments.</li> </ol> <p>(c) The minimum retention period for the point (b) records shall be four years.</p>	<p>This system is already in place ASQA controlled RTOs</p>
<p style="text-align: center;"><b>AMC 147.B.20 Record-keeping</b></p> <p><i>ED Decision 2015/029/R</i></p> <p>1. The record-keeping system should ensure that all records are accessible whenever needed within a reasonable time. These records</p>	

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<p>should be organized in a consistent way throughout the competent authority (chronological, alphabetical order, etc.).</p> <ol style="list-style-type: none"> <li>2. All records containing sensitive data regarding applicants or organisations should be stored in a secure manner with controlled access to ensure confidentiality of this kind of data.</li> <li>3. All computer hardware used to ensure data backup should be stored in a different location from that containing the working data in an environment that ensures they remain in good condition. When hardware- or software-changes take place special care should be taken that all necessary data continues to be accessible at least through the full period specified in 147.B.20.</li> </ol>	<p style="text-align: center;"><b>This system is already in place ASQA controlled RTOs</b></p>
<p><b>147.B.25 Exemptions</b></p> <p><i>Regulation (EU) 2019/1383</i></p> <p>(a) The competent authority may exempt a State education department school [system] from:</p> <ol style="list-style-type: none"> <li>1. being an organisation as specified in point 147.A.10.</li> <li>2. having an accountable manager, subject to the limitation that the department appoint a senior person to manage the training organisation and such person has a budget sufficient to operate the organisation to the standard of this Annex (Part-147).</li> <li>3. having recourse to the independent audit part of a quality system subject to the department operating an independent schools inspectorate to audit the maintenance training organisation at the frequency required by this Part.</li> </ol> <p>(b) All exemptions granted in accordance with Article 71(1) of Regulation (EU) 2018/1139 shall be recorded and retained by the competent authority.</p> <p>This Subpart provides the requirements to issue or vary the maintenance training organisation approval.</p>	<p style="text-align: center;">This provision enable government to make the Education Department responsible by recognition of Australia's Education system that is quite capable to managed aviation maintenance personnel training.</p>
<p><b>SUBPART B — ISSUE OF AN APPROVAL</b></p> <p><i>Regulation (EU) No 1321/2014</i></p> <p>This Subpart provides the requirements to issue or vary the maintenance training organisation approval.</p>	<p style="text-align: center;">All covered by ASQA powers</p>
<p><b>147.B.110 Procedure for approval and changes to the approval</b></p> <p><i>Regulation (EU) No 1321/2014</i></p> <p>(a) Upon receipt of an application, the competent authority shall:</p> <ol style="list-style-type: none"> <li>1. review the maintenance training organisation exposition; and</li> <li>2. verify the organisation's compliance with the requirement of Annex IV (Part-147).</li> </ol> <p>(b) All findings identified shall be recorded and confirmed in writing to the applicant.</p> <p>(c) All findings shall be closed in accordance with point 147.B.130 before the approval is issued.</p> <p>(d) The reference number shall be included on the approval certificate in a manner specified by the Agency.</p>	<p style="text-align: center;">All covered by ASQA powers</p>

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### GM to 147.B.110 Procedure for approval and changes to the approval

*ED Decision 2015/029/R*

1. A meeting should be arranged between the applicant and the Member State who issue Part-147 approvals to determine if the applicant's training activities justify the investigation for issue of Part-147 approval and to ensure that the applicant understands what needs to be done for Part-147 approval. This meeting is not intended to establish compliance but rather to see if the activity is a Part-147 activity.
2. Assuming that the applicant's activities come within the scope of Part-147 approval, instructions should be sent to the competent authority staff requesting that an audit of the applicant be carried out and when satisfied that compliance has been established, a recommendation for the issue of approval should be submitted to the competent authority staff who grant approval unless these are the same staff. The competent authority should determine how and by whom the audit shall be conducted. For example, if the applicant is a large training organisation, it will be necessary to determine whether one large team audit or a short series of small team audits or a long series of single person audits is most appropriate for the particular situation. A further consideration in the case of a combined Part-145/147 organisation is the possibility to combine the audits.
3. Where it is intended that the maintenance training organisation may conduct training and examinations away from the maintenance training organisation address(es) in accordance with 147.A.145(c), then a sample audit should be carried out by the competent authority from time to time of the process to ensure that procedures are followed. For practical reasons such sample audits will need to be carried out when training is being conducted away from the maintenance training organisation address(es).
4. The auditing surveyor should ensure that they are always accompanied throughout the audit by a senior member of the organisation making application for Part-147 approval. Normally this should be the proposed quality manager. The reason for being accompanied is to ensure that the organisation is fully aware of any findings during the audit. In any case, the proposed quality manager/senior member of the organisation should be debriefed at the end of the audit visit on the findings made during the audit.
5. There will be occasions when the auditing surveyor may find situations in the applicant's organisation on which he/she is unsure about compliance. In this case, the organisation should be informed about possible non-compliance at the time of audit and the fact that the situation will be reviewed before a decision is

All covered by ASQA powers

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made. The organisation should be informed of the decision within 2 weeks of the audit visit in writing if the decision is a confirmation of non-compliance. If the decision is a finding of being in compliance, a verbal confirmation to the organisation will suffice.

6. A change of name of the maintenance training organisation requires the organisation to submit a new application as a matter of urgency stating that only the name of the organisation has changed including a copy of the organisation exposition with the new name. Upon receipt of the application and the organisation exposition, the competent authority should reissue the approval certificate valid only up to the current expiry date.
7. A name change alone does not require the competent authority to audit the organisation, unless there is evidence that other aspects of the maintenance training organisation have changed.
8. A change of accountable manager requires the maintenance training organisation to submit such fact to the competent authority as a matter of urgency together with the amendment to the accountable manager exposition statement.
9. A change of any of the senior personnel specified in 147.A.105(b) requires the maintenance training organisation to submit a Form 4 in respect of the particular person. If satisfied that the qualifications and experience meet the standard required by Part-147, the competent authority should indicate acceptance in writing to the maintenance training organisation.
10. A change in the maintenance training organisation's exposition requires the competent authority to establish that the procedures specified in the exposition are in compliance with Part-147 and then to establish if these are the same procedures intended for use within the training facility.
11. Any change of location of the maintenance training organisation requires the organisation to make a new application to the competent authority together with the submission of an amended exposition. The competent authority should follow the procedure specified in 147.B.110(a) and (b) in so far as the change affects such procedure before issuing a new Part-147 approval certificate.
12. The complete or partial reorganisation of a training organisation should require the re-audit of those elements that have changed.
13. Any additional basic or aircraft type training courses requires the maintenance training organisation to make a new application to the competent authority together with the submission of an amended exposition. For basic training extensions, an additional sample of new examination questions relevant to the modules associated with the extension being sought will be required to be submitted. The competent authority should follow the procedure of paragraph 11 in so far as the change affects such procedures unless the competent authority is satisfied that the maintenance training organisation has a well-controlled procedure to qualify

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<p>such change when it is not necessary to conduct the audit elements of the paragraph 11 procedure.</p>	
<p style="text-align: center;"><b>AMC 147.B.110(a) Procedure for approval and changes to the approval</b></p> <p><i>ED Decision 2015/029/R</i></p> <ol style="list-style-type: none"> <li>1. The audit should be conducted on the basis of checking the facility for compliance, interviewing personnel and sampling any relevant training course for its conduct and standard.</li> <li>2. The audit report should be made on an EASA Form 22 (see appendix III).</li> </ol>	<p style="text-align: center;">All covered by ASQA powers</p>
<p style="text-align: center;"><b>AMC 147.B.110(b) Procedure for approval and changes to the approval</b></p> <p><i>ED Decision 2015/029/R</i></p> <p>The date each finding was rectified should be recorded together with the reference document.</p>	<p style="text-align: center;">All covered by ASQA powers</p>
<p style="text-align: center;"><b>147.B.120 Continued validity procedure</b></p> <p><i>Regulation (EU) No 1321/2014</i></p> <ol style="list-style-type: none"> <li>(a) Each organisation shall be completely audited for compliance with this Annex (Part-147) at periods not exceeding 24 months. This shall include the monitoring of at least one training course and one examination performed by the maintenance training organisation.</li> <li>(b) Findings shall be processed in accordance with point 147.B.130.</li> </ol>	<p style="text-align: center;">All covered by ASQA powers</p>
<p style="text-align: center;"><b>AMC 147.B.120(a) Continued validity procedure</b></p> <p><i>ED Decision 2015/029/R</i></p> <ol style="list-style-type: none"> <li>1. Audits should be conducted to ensure the continuity of the approval; it is not necessary to sample all basic and type training courses, but the competent authority should sample, as appropriate, one basic and one type training course to establish that training is conducted in an appropriate manner. Nevertheless, the duration of the sampling for each course should not be less than 3 hours. Where no training course is being conducted during the audit, arrangements should be made to return at a later date to sample the conduct of a training course.</li> <li>2. It is not necessary to sample all examinations associated with a training course but the competent authority should sample, as appropriate, one basic and one type training course examination.</li> </ol>	<p style="text-align: center;">All covered by ASQA powers</p>
<p style="text-align: center;"><b>147.B.125 Maintenance training organisation approval certificate</b></p> <p><i>Regulation (EU) No 1321/2014</i></p> <p>The maintenance training organisation approval certificate format shall be as detailed in Appendix II.</p>	<p style="text-align: center;">All covered by ASQA powers</p>
<p style="text-align: center;"><b>147.B.130 Findings</b></p> <p><i>Regulation (EU) No 1321/2014</i></p> <ol style="list-style-type: none"> <li>(a) Failure to complete the rectification of any level 1 finding within three days of written notification shall entail revocation,</li> </ol>	<p style="text-align: center;">All covered by ASQA powers</p>

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<p>suspension or limitation by the competent authority, of the maintenance training organisation approval in whole or in part.</p> <p>(b) Action shall be taken by the competent authority to revoke, limit or suspend in whole or part the approval in case of failure to comply within the time scale granted by the competent authority in the case of a level 2 finding.</p>	
<p><b>AMC 147.B.130(b) Findings</b></p> <p><i>ED Decision 2015/029/R</i></p> <ol style="list-style-type: none"><li>1. In the case of a level 2 finding, the competent authority may give up to six-month notice of the need for rectification. Dependent upon the seriousness of the level 2 finding(s) the competent authority may choose a notice period less than six months.</li><li>2. When the competent authority chooses to allow six months, the initial notification should be of three-month duration to the quality manager followed by the final three-month notice to the accountable manager</li></ol>	<p style="text-align: center;">All covered by ASQA powers</p>

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## Part 147 Regulation Part C

<b>SUBPART C — REVOCATION, SUSPENSION AND LIMITATION OF THE MAINTENANCE TRAINING ORGANISATION APPROVAL</b>																																					
<p><b>147.B.200 Revocation, suspension and limitation of the maintenance training organisation approval</b></p> <p><i>Regulation (EU) No 1321/2014</i></p> <p>The competent authority shall:</p> <ul style="list-style-type: none"> <li>(a) suspend an approval on reasonable grounds in the case of potential safety threat; or</li> <li>(b) suspend, revoke or limit an approval pursuant to 147.B.130.</li> </ul>	<p>ASQA has these powers</p>																																				
<b>APPENDICES TO ANNEX IV (PART-147)</b>																																					
<p><b>Appendix 1 – Basic training course duration</b></p> <p><i>Regulation (EU) 2018/1142</i></p> <p>The minimum duration of a complete basic training course shall be as follows:</p>	<p>Never applied by CASA</p>																																				
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Basic Course</th> <th style="width: 25%;">Duration (in hours)</th> <th style="width: 50%;">Theoretical Training Ratio (in %)</th> </tr> </thead> <tbody> <tr><td>A1</td><td>800</td><td>30–35</td></tr> <tr><td>A2</td><td>650</td><td>30–35</td></tr> <tr><td>A3</td><td>800</td><td>30–35</td></tr> <tr><td>A4</td><td>800</td><td>30–35</td></tr> <tr><td>B1.1</td><td>2 400</td><td>50–60</td></tr> <tr><td>B1.2</td><td>2 000</td><td>50–60</td></tr> <tr><td>B1.3</td><td>2 400</td><td>50–60</td></tr> <tr><td>B1.4</td><td>2 400</td><td>50–60</td></tr> <tr><td>B2</td><td>2 400</td><td>50–60</td></tr> <tr><td>B2L</td><td>1 500 (*)</td><td>50–60</td></tr> <tr><td>B3</td><td>1 000</td><td>50–60</td></tr> </tbody> </table>	Basic Course	Duration (in hours)	Theoretical Training Ratio (in %)	A1	800	30–35	A2	650	30–35	A3	800	30–35	A4	800	30–35	B1.1	2 400	50–60	B1.2	2 000	50–60	B1.3	2 400	50–60	B1.4	2 400	50–60	B2	2 400	50–60	B2L	1 500 (*)	50–60	B3	1 000	50–60	<p>Cat A:- 2/3rd practical</p> <p>B 50-50</p>
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<p>(*) This number of hours shall be increased as follows, depending on the additional system ratings selected:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">System Rating</th> <th style="width: 25%;">Duration (in hours)</th> <th style="width: 50%;">Theoretical Training Ratio (in %)</th> </tr> </thead> <tbody> <tr><td>COM/NAV</td><td>90</td><td rowspan="5" style="text-align: center; vertical-align: middle;">50–60</td></tr> <tr><td>INSTRUMENTS</td><td>55</td></tr> <tr><td>AUTOFLIGHT</td><td>80</td></tr> <tr><td>SURVEILLANCE</td><td>40</td></tr> <tr><td>AIRFRAME SYSTEMS</td><td>100</td></tr> </tbody> </table>			System Rating	Duration (in hours)	Theoretical Training Ratio (in %)	COM/NAV	90	50–60	INSTRUMENTS	55	AUTOFLIGHT	80	SURVEILLANCE	40	AIRFRAME SYSTEMS	100	<p>50/50</p>																				
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