



# 2024—2025 Aviation Engineering Project

**Aim: Government to Provide Access to Global Civil Aviation Markets for Australian Civil Aviation Engineering Businesses.**

Change the regulatory development focus from looking inwards to a global focus for our CASA approved design, manufacturer and maintenance organisations by arranging bilateral/multilateral agreements with other nations that accept government documents such as: *Authorised Release Certificate*, *CASA Approved Design*, *Manufacture and Maintenance Organisations'* certificates while supporting a domestic market system.

***The Portfolio Department will need to implement this policy within Departments and Agencies.***

The reason for this project is that Australia's civil aviation engineering regulatory system is unique, not fit for international trade, dated, and no longer aligned with the Convention's Standards & Recommended Practices and the US Federal Aviation Regulations enabling trade by Australian manufacturing and maintenance businesses globally.

Success will only be achieved when the government's *Authorised Release Certificate*, and *CASA Approved Design, Manufacture and Maintenance Organisations'* certificates are accepted in their own rights by other ICAO Contracting States, with or without conditions.

This is the aim of the Convention (treaty) signed by Australia some 76 years ago.

## Adopt Global Aviation Regulations & Standards

Australia ratified the Chicago Convention 1/3/47 that became effective 4/4/47, some **76 plus years ago**. In signing this Convention (Treaty), Australia's obligations include remaining compliant with the Convention Annexes Standards & Recommended Practices (SARPs).

Any differences in the engineering fields mean non-harmonisation with the FAA and other nations' civil aviation engineering markets.

Harmonisation with FARs was Department and CAA policy in 1992.

Since creating an Agency as Australia's Civil Aviation Safety Regulator, remaining compliant with SARPs has been given a low priority resulting, especially in the engineering disciplines of design, manufacture, maintenance, and maintenance personnel training, in not being harmonised with the global civil aviation standards under the Convention that is supported by detailed guidance material promulgated by the International Civil Aviation Organisation (ICAO).

ICAO General Assemblies, they happen every few years, also promulgate 'Resolutions', agreed to by all ICAO Contracting States, that countries agree to implement.

- Resolutions are mainly global interpretations of SARPs. Global Policy.

Resolution A29, Oct 1992, urges all Countries to harmonise (with FAR or EASR) and **use the precise language of the SARPs in their regulatory requirements.**

- Hard to find examples in CASRs.

**ICAO:** The aim of the [Managing Compliance with ICAO SARPs](#) training course is to enable CAA senior and middle managers to plan, manage and continuously monitor the implementation of Standards And Recommended Practices (SARPs) in their States. Not used by government.

### Action Required:

- All government senior staff involved with regulatory development must complete this ICAO training course.
- The Convention places an obligation on Australia to remain in compliance with the Annexes Standards and Recommend Practices.

**Australia still not harmonised after 35 years of Agency management.**



# Convention on International Civil Aviation

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## **Become Compliant or Remain Globally Isolated — Engineering**

Australia was last compliant, from an engineering, design, manufacture, maintenance and personnel training, perspective, with engineering SARPs pre the creation of an Agency to regulate civil aviation. Should be an Agency to Administer civil aviation like the FAA.

For engineering design, manufacture, maintenance businesses to have access to other nations’ civil aviation markets, then compliance with engineering SARPs must be fully adopted and implemented.

Australia currently lacks government employees with the skills and experience to develop a SARP compliant regulatory system for the experienced and innovative manufacturing and maintenance sectors of civil aviation. Government has not had its employees trained by ICAO or the FAA to meet these responsibilities.

This is holding back and restricting the possibilities of these industry sectors. It is why there is a critical shortage of tradespersons that could be licenced by the regulator.

### **Convention Article 37**

AMROBA supports full adoption of all engineering Standards and Procedures.

#### ***Adoption of international standards and procedures***

*“Each contracting State undertakes to collaborate in securing **the highest practicable degree of uniformity in regulations, standards, procedures, and organization in relation to aircraft, personnel, airways, and auxiliary services in all matters in which such uniformity will facilitate and improve air navigation.***

*To this end the International Civil Aviation Organization shall adopt and amend from time to time, as may be necessary, international standards and recommended practices and procedures dealing with:*

*Examples.*

- c) Rules of the air and air traffic control practices;*
- d) Licensing of operating and **mechanical personnel**;*
- e) **Airworthiness of aircraft**;*
- f) Registration and identification of aircraft;*
- h) Log books;*
- i) Aeronautical maps and charts;*
- k) Aircraft in distress and investigation of accidents;”*

#### **Action Required**

**Within the Portfolio Department, staff to be trained to ensure all applicable developed aviation regulations use the highest practical degree of the precise language of the SARPs.**

**That the Portfolio Department monitor SARPs and direct regulatory change in a timely manner to include amendments to SARPs.**

**Review all current regulations for compliance with SARPs.**

## Convention Article 38

**Note:** AMROBA cannot see any reason to raise a difference for any engineering SARP.

How can Australia, with very mature civil aviation engineering businesses, find it impracticable to comply in all respects?

### *“Departures from international standards and procedures*

*Any State which finds it impracticable to comply in all respects with any such international standard or procedure, or to bring its own regulations or practices into full accord with any international standard or procedure after amendment of the latter, or which deems it necessary to adopt regulations or practices differing in any particular respect from those established by an international standard, shall give immediate notification to the International Civil Aviation Organization of the differences between its own practice and that established by the international standard. In the case of amendments to international standards, any State which does not make the appropriate amendments to its own regulations or practices shall give notice to the Council within sixty days of the adoption of the amendment to the international standard or indicate the action which it proposes to take. In any such case, Council shall make immediate notification to all other states of the difference which exists between one or more features of an international standard and the corresponding national practice of that State.”*

### **Action Required**

**The portfolio Department must adopt policies to prevent engineering differences being lodged with ICAO that also informs all other ICAO nations that Australia does not comply with a SARP thus restricting trading capabilities.**

## Harmonisation Standards

Aircraft and aircraft parts manufacture can only be marketed to other nations if Australia’s aircraft product certification and manufacturing standards are also acceptable by other major civil aviation manufacturing nations.

In the past Australia’s designs, manufacture and maintenance businesses, to market and provide on going service, have had to relocate overseas, mainly to the USA so their products can be used globally.

Australia’s design, manufacture and maintenance international recognition is at the lowest level since an Agency became responsible for regulating this industry.

The current regulatory framework is why industry is in such a mess and unique to Australia.

*“The establishment and maintenance of international Standards and Recommended Practices (SARPs), as well as Procedures for Air Navigation (PANS), are **fundamental tenets of the Convention on International Civil Aviation (Chicago Convention)** and a core aspect of ICAO’s mission and role.*

*SARPs and PANS are critical to ICAO Member States and other stakeholders, given that they provide the **fundamental basis for harmonized global aviation safety and efficiency in the air and on the ground, the worldwide standardization of functional and performance requirements of air navigation facilities and services, and the orderly development of air transport.**”*

Obviously, the talent and expertise to meet Australia’s obligations under the treaty is no longer available so adoption in full of the FAA regulatory system, or in specific circumstances, adoption in full of EASA specific Parts must be the solution for Australia’s aviation long term survival.

This correction to our regulatory system can only happen if the FAA system is fully adopted and a difference agreement, based on the FAA/EASA agreement, is negotiated with EASA.

### **Action Required**

**The portfolio Department set policy to remove barriers to global trading by adopting the FAR Parts wherever possible.**

**CASA, and its predecessor, have failed/refused to harmonise with the biggest civil aviation market for the benefit of Australian civil aviation engineering, who the majority favour, the FAR system.**

## Globalise Maintenance Personnel Training & Qualifications

**Annex 8: 6.6.4** places the responsibility on Contracting States (Australia) to establish the competence of maintenance personnel, including ensuring the person signing the maintenance release meet the Convention Annex 1, Chapter 4 LAME Standards.

ICAO provides comprehensive guidance material to apply global trade based training standards and curricula and, in addition, additional licencing knowledge standards. Competency based training is included in the ICAO provided documents.

Before an Agency was created to regulate aviation, the Federal and State training management use to implement the ICAO trade training syllabi promulgated by DCA in Publication 35.

Why does CASA require a costly, complicated, unique trade training system, excluding piston powered aeroplane and helicopter pathways, that has led to a critical shortage of maintenance personnel?

Worse still, they know there is a shortage but have no plans to change the regulations that have caused the shortage.

Why is it all other trade licencing regulators can work with the VET system to provide accepted VET trade qualifications underpinning their licences?

That is exactly what CASA's pre 2001 management was working to achieve. The technical expertise and experience that is no longer evident in CASA, is why we have the shortage of personnel.

It is not the fault of the trade training regulator, ASQA, it is the fault of CASA not promulgating standards that harmonise with Australia's competency-based training standards thus excluding a cost-effective trade training CBT system being implemented.

Australian employers and unions understand the NVET CBT system, why won't CASA learn.

Unlike the other 21 ICAO top nations, Australia **has not adopted** or implemented these **minimum global maintenance personnel training standards** that underpin the maintenance personnel trade qualifications and CASA Aircraft Maintenance Engineer Part 66 licences, except for the Part 66 B1.1 & B2 licences.

Worse still, CASA senior management refuse to adopt training hours allocated by ICAO Standards referred maintenance personnel training manuals. Every other NAA has no issue with promulgating training hours. So part compliance is why we have a shortage of maintenance personnel.

CASA is a licencing Authority; it is not an education Authority or trade training Authority.

This is a major restriction preventing the proper training of maintenance personnel by the NVET system. Globally, the AME course training syllabi and course training hours are promulgated by the aviation regulator.

AMROBA members that have employed foreign AMEs/LAMEs are surprised how better trained they are compared with Australian trained AMEs/LAMEs.

Since the FAA rewrote the Aircraft Maintenance Technician syllabi in 2021, they exceed the training standards in Australia for any B1 licence.

The helicopter and piston powered aeroplane sectors do not have any VET courses to become qualified some 15 plus years after CASA partly adopted the EASR Part 66 licence system.

Trade training supporting piston powered aeroplanes and helicopters have not been available because government departments and agencies will not work together. CASA/ASQA.

### **Action Required**

**Transfer the responsibility for trade qualifications (based on EASA Part 66 modules, excluding module 10-licencing) to DEWR and ensure CASA accepts these CB VET qualifications.**

**That DEWR adopt EASA's trade training course standards to provide equivalent qualifications.**

**The NVET system to continue the airline LAME Diploma courses.**