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Simplifying – No Doubling of Approval – AME/LAME Training.

To provide benefits to the aircraft maintenance personnel licencing system adopted from the European Union (EU) legislation, the adoption of the intent of ***EASR Part 147.B.25*** (not adopted) **would remove duplication** of Australia's NVET recognised training organisations (RTOs) like TAFE and other VET providers, by CASA. CASR Part 147 MTOs would not be used for trade and licencing training under the NVET system. Costs reduced.

EASR 147.B.25 Exemptions

Use ASQA RTOs & NVET trade training system

Regulation (EU) 2019/1383

(a) The competent authority **may exempt a State educ… department school** from:

1. **being an organisation as specified in point 147.A.10**.
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).**

In other words, Australia's education system has a NVET system that can provide training to the licencing authority's (CASA) promulgated course standards (CASR Part 66 MoS Appendix 1). What value is added for CASA to also approve the RTO?

TAFE's colleges in Australia are funded to provide trade training to the standards of licencing authorities. This applied pre CASR Part 147 being made and there was not a critical shortage of maintenance personnel under that system.

However, the NVET system was based on an avionics and mechanical trade training system and five trade based licences issued by CASA. Airframe, Engine, Electrical, Instrument & Radio.

The following chart shows how the NVET training situation, still trade based, has changed over the last 20 odd years and how NVET training courses are still not available for all Part 66 licences. How come it is decades before NVET courses are being developed to support the B1.2 (small aeroplane) & B1.3/4 (helicopter) maintenance personnel?

The issue is that CASA introduced a licencing system based on kinds of aircraft and not based on the NVET trade training system. AMROBA has pushed hard for separate B1.2 and B1.3/4 NVET courses to be added to the NVET courses and be available through the TAFE system.

<table>
<tr><th colspan="7">THE UNSUCCESSFUL PART 66 MAINTENANCE PERSONNEL SYSTEM</th></tr>
<tr><td colspan="7">Pre CAA/CASA</td></tr>
<tr><td>ICAO standards</td><td colspan="3">Avionics</td><td colspan="3">Mechanical</td></tr>
<tr><td></td><td>Electrical</td><td>Instruments</td><td>Radio</td><td>Airframes</td><td colspan="2">Engines</td></tr>
<tr><td colspan="7">Post CAA</td></tr>
<tr><td>Airline</td><td colspan="3">Avionics</td><td colspan="2">Mechanical Systems</td><td>Structures</td></tr>
<tr><td>Non-Airline</td><td>Electrical</td><td>Instruments</td><td>Radio</td><td>Airframes</td><td>Engines</td><td>N/A</td></tr>
<tr><td colspan="7">Post CASR Part 66</td></tr>
<tr><td>Aircraft</td><td colspan="2">Large aeroplanes
Avionics/mechanical systems</td><td>Mechanical
small aeroplanes</td><td>Mechanical
helicopters</td><td colspan="2">Structures</td></tr>
<tr><td>Airline</td><td>B2 - AQF V Diploma</td><td>B.1.1 - AQF V Diploma</td><td>B1.2 – None</td><td>B1.3/4 – None</td><td colspan="2">AQF IV</td></tr>
<tr><td colspan="7">Note: The airline AME/LAME system is well supported by the structures AQF IV & avionic and mechanical Diploma courses specific for <u>large aeroplane maintenance</u> already being available in the NVET system.</td></tr>
<tr><td rowspan="2">Non-Airline</td><td>B2</td><td colspan="5">B1</td></tr>
<tr><td colspan="5">The CASR Part 66 MoS Appendix 1 syllabi for the B1.2, B1.3 & B1.4 have no NVET courses.</td></tr>
<tr><td rowspan="2">P66 Modular System</td><td>B2</td><td>B1.1</td><td>B1.2</td><td>B1.3</td><td colspan="2">B1.4</td></tr>
<tr><td>(e.g. electrical, instrument, radio)</td><td>(e.g. large aeroplane airframe & engines</td><td>(e.g. airframe, engine, propeller)</td><td></td><td colspan="2"></td></tr>
<tr><td>NVET Courses still to be developed.</td><td>Available</td><td>Available</td><td>Small aeroplane course, Part 66 standards.</td><td colspan="3">Helicopter course, based on CASA Standards specified in Part 66 MoS Appendix 1</td></tr>
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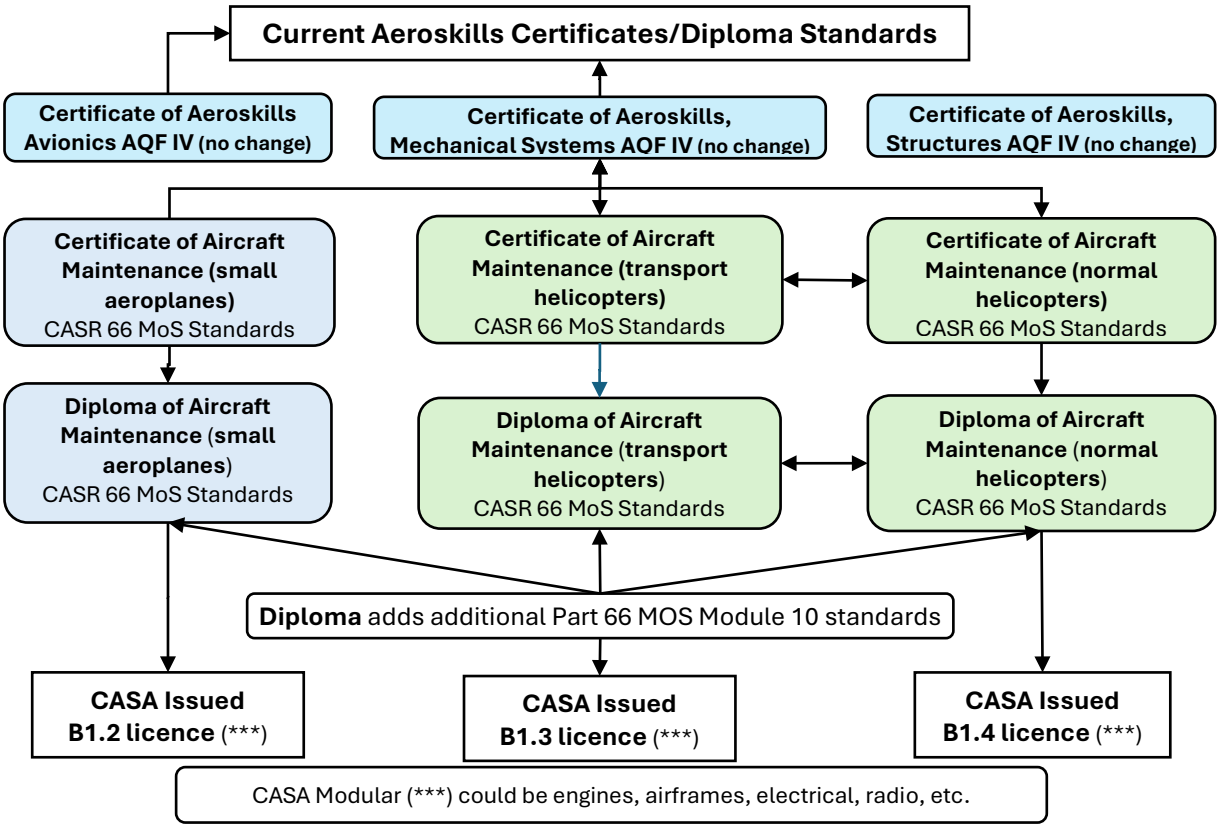
Why government and its agencies, e.g. CASA, ASQA and DEWR, couldn't work together post introducing CASR Part 66/147 to develop NVET training courses for the B1.2, B1.3 & B1.4 to support each of the aircraft licences CASA issues, is almost incredible. 17 + years.

Understanding the NVET System.

How can we fit the ***Part 66 B1.2, B1.3 & B1.4*** licence training standards into the current Aeroskills training system? One way would be to create subset competency units (certificates/diploma) under each of the current Aeroskill competency units that are applicable to support aircraft maintenance personnel for small aeroplanes and normal and transport helicopters.

The Aeroskill AQF Level IV trade certificates cannot be changed, they are part of trade union industrial awards. By only using the competencies specific to unpressurised aeroplanes or all helicopters, the NVET system can create new certificates and diplomas that support the licences issued by CASA. Additional bridging courses would include those parts of the competency units that are applicable to the other streams as below. Note Certificates/Diplomas are subsets of Certificates of Aeroskills (avionics/mechanical).



Under the Certificate IV of Aeroskills (Mechanical) and Diploma of Aeroskills (Mechanical) would be two (2) streams each having *Certificate of Aircraft Maintenance* (small aeroplanes) or (helicopters). AMROBA recommends combining the two (2) helicopter streams above.

Note: It is not known of a maintenance organisation that only looks after a B1.4 helicopter.

Summary

This process will require MISA to carry out a mapping of the two competency units to align with the two new streams for the CASA B1.2 & B1.3/4 licence streams for the small aeroplane and helicopter sectors.

The estimate time will mean that this project will not conclude until late in 2025 unless some current RTOs have already done the mapping and can assist MISA to complete earlier.

At least some progress is being made by MISA.