

## Aircraft Maintenance Trade and Licencing

A couple of members who recently visited Europe and couldn't resist the temptation to visit some secondary airports, mainly general and recreational aviation, suggest we have missed the benefits of the current EASA licencing system and the possibility of extending their Part 66 "Limited" licencing system to include the proposed Part 43 "repairman" and the CAR 42ZC (6) CASA authorised persons as CASR Part 66 "Limited" licences.

### So what are EASA Limited AME licences?

EASA has provided a Part 66 AME limited licence for each of the kinds of aircraft specified as ELA1 and ELA 2 aircraft:

"ELA1 aircraft" means the following manned European Light Aircraft:

- (i) an aeroplane with a Maximum Take-off Mass (MTOM) of 1200 kg or less that is not classified as complex motorpowered aircraft;
- (ii) (ii) a sailplane or powered sailplane of 1200 kg MTOM or less;
- (iii) (iii) a balloon with a maximum design lifting gas or hot air volume of not more than 3400 m3 for hot air balloons, 1050 m3 for gas balloons, 300 m3 for tethered gas balloons;
- (iv) (iv) an airship designed for not more than four occupants and a maximum design lifting gas or hot air volume of not more than 3400 m3 for hot air airships and 1000 m3 for gas airships; and

"ELA2 aircraft" means the following manned European Light Aircraft:

- (i) an aeroplane with a Maximum Take-off Mass (MTOM) of 2000 kg or less that is not classified as complex motor-powered aircraft;
- (ii) a sailplane or powered sailplane of 2000 kg MTOM or less;
- (iii) a balloon;
- (iv) a Very Light Rotorcraft with a MTOM not exceeding 600 kg which is of a simple design, designed to carry not more than two occupants, not powered by turbine and/or rocket engines; restricted to VFR day operations."

### Adopt and Expand EASA "Limited" Part 66 Licence.

It is suggested CASA adopt the EASA Part 66 "Limited" licence concept but add the proposed Part 43 repairman and also the CAR 42ZC (6) authorised person as Part 66 "Limited" licences.

This would mean that all licences would have a national standard for each pathway which would enable NVET training courses, government training funding, and Part 149 organisations empowered to issue the Limited licence associated with their Part 149 approval as they currently perform.

A workable AME Licencing System – Not Achieved Yet								
Steps	B1.1	B1.2	B1.3	B1.4	B3	B (Limited)	B2	B2L/systems
7	Adopt EASR Part 66 "groups" or amend "group ratings" to include CAR 31 "groups" as determined. Adopt EASR Part 66 "limited licences" and add additional limited licence ratings. Add 'Structures' & '43 Repairman', CASR Part 42ZC (6) authorised person to the Limited AME licence.							CASA
6	Broadening the current Part 66 licences to cover what is possible under CAR 42ZC(6). Instead of CASA Authorisation, replace as a "Limited" Part 66 licence – massive potential							CASA
5	Applicable Part 66 licence based on industry employment experience plus Either hold applicable academic trade qualification or allied trade/self-study pathway & CASA Exams.							CASA
4	Obtain AQF V licence training qualification based on module 10/ICAO doc Chapter 3							DEWR
3	Licence experience based on applied industry employment experience (not full trade training coverage)							DEWR
2	Recognise avionic, mechanical & structures full trade training courses iaw ICAO standards (AQF IV)							CASA
1	Basic Engineering Preemployment Training (adopt NZ course) includes modules 1 &2							DEWR

Adopting a proven system from the licencing system that CASA based its CASR Part 66 on should be considered seriously by CASA.

**Recommendation:** Adopt EASR Part 66 "Limited" licence concepts and apply to CASR Part 43 repairman, include the CAR 42ZC (6) authorised person as a "limited" AME Part 66 licence.

At least the concept of the EASA Part 66 licencing system would be applied across all sectors.

## Current Issue

How have we got into such a mess with trade training and licencing in civil aviation? Ans. Costs!

Since the introduction of CASR Part 66, adopted to reduce training costs, CASA has been trying to get in place specific licencing trade training courses limiting the national trade training system. NVET has not been able to accommodate. CASA has not promulgated separate courses for each of their licences to be used or approved specific courses in their approved Part 147 MTOs. CASR Part 147 MTOs are really ASQA approved RTOs complying with ASQA standards. A conflict still not settled. CAA no course funding, ASQA/DEWR provide course funding.

**Issue:** What is being asked of the trade unions is to agree with different trade pathway qualifications based on CASA licencing pathways instead of holding full industry wide trade qualifications. This directly affect their industrial awards. Never going to happen. Changes to awards need to be ratified by the Fair Work Commission.

**Fact:** Tradespersons and their unions will protect their members' industrial trade awards that are industry based, not pathway limited based on CASA licences.

**Fact:** AMOs, under Part 66, expected specific NVET AME training courses that supported each of CASA's licences as it would make training costs specific to the licence required by the AMO.

This process limits the trade training qualification transportability across the whole industry.

**Question:** Why does CASA try to restrict trade training?

1. If the NVET trade training for avionics or mechanical is industry wide, why isn't the NVET qualification acceptable as meeting trade standards for any of the licences/sub licences CASA issues?
2. Licencing specific subjects are contained in CASR Part 66 MoS module 10. Only addition to trade training required is to hold a CASA licence.

**Result:** What is being asked of the trade unions is to agree with specific trade qualification based on employer licence needs instead of full industry trade qualifications.

**Answer:** CASA accept the industry wide NVET trade training meets all of the A & B licences/sub-licences and only require a qualified tradesperson to complete module 10 to obtain a licence. The NVET system separate trade (AQF IV) training to be held then add licence (AQF V) to obtain a licence using the formal training pathway.

## Trade Training

Formal trade training needs to be re-structured and transformed to meet 2023 aircraft maintenance engineer global standards. This is a review and enhancement of the avionic, mechanical and structures trade training. This is the responsibility of the governments new Manufacturing Skills Alliance Council under the Department of Employment & Workplace Relations.

From an employer position we need the following academic stages to be met:

- Preemployment training standard: AQF II training standards be met. e.g. Modules 1 & 2.
- Basic engineering practical skills: AQF III industry practical skills
- Avionics, mechanical or structures: AQF IV trade specific theoretical/practical skills

## Licence Training

Formal licencing training must provide additional licencing knowledge to enable the LAME to certify as "airworthy" the aircraft or parts of the aircraft being maintained and to fully coordinate maintenance so the LAME can sign the maintenance release however described.

Must hold AQF IV avionic or mechanical trade qualification to obtain AQF V or VI qualification.

From an employer position we need the following academic stages to be met:

- LAME supervisory/certifying: AQF V Module 10 supervisory skills
- LAME management: AQFVI Module 10 management skills

## *The Approved EASA Course*

- *must be taught by a training provider holding Part 147 approval issued by the relevant National Aviation Authority. AST is approved by the UK CAA and EASA.*
- *must provide a minimum number of training hours, 800 for Category A and 2400 for category B.*
- *must provide the required percentage of training hours for the development of practical skills on representative aircraft and systems, this includes Aircraft Maintenance Environment Training (AMET), at a Part 145 approved maintenance organisation. AST organises and supervises such AMET as well as providing basic skills training in its Hangar teaching facility.*

*AST, since 1931, is a fully owned subsidiary of Scotland's University of the Highlands and Islands.*

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